

ACCESS TO
NUTRITION
INITIATIVE

BMS Marketing Index 2024

March 2024

Disclaimer

ATNI is an independent, non-profit organization that bases its work on research which includes the input of many stakeholders. ATNI's research and Indexes do not assess compliance with local regulations or laws, but rather assess private sector performance against international standards and guidance. The findings, interpretations, and conclusions expressed in this report may not necessarily reflect the views of all companies, members of the stakeholder groups or the organizations they represent, or of the funders of the project. This report is intended to be for informational purposes only and is not intended as promotional material in any respect. This report is not intended to provide accounting, legal or tax advice, or investment recommendations. Whilst based on information believed to be reliable, no guarantee can be given that it is accurate or complete.

The user of the report and the information in it assumes the entire risk of any use it may make or permit to be made of the information. NO EXPRESS OR IMPLIED WARRANTIES OR REPRESENTATIONS ARE MADE WITH RESPECT TO THE INFORMATION (OR THE RESULTS TO BE OBTAINED BY THE USE THEREOF), AND TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, ALL IMPLIED WARRANTIES (INCLUDING, WITHOUT LIMITATION, ANY IMPLIED WARRANTIES OF ORIGINALITY, ACCURACY, TIMELINESS, NONINFRINGEMENT, COMPLETENESS, MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE) WITH RESPECT TO ANY OF THE INFORMATION ARE EXPRESSLY EXCLUDED AND DISCLAIMED.

Euromonitor International intelligence is used under license. Although Euromonitor aims to correct inaccuracies of which it is aware, it does not warrant that the data will be accurate, up-to-date or complete as the accuracy and completeness of the data and other content available in respect of different parts of the content will vary depending on the availability and quality of sources on which each part is based. Furthermore, Euromonitor does not warrant that the data will be fit for any particular purpose(s) for which they are used as Euromonitor does not have any knowledge of, nor control over, those purposes.

Acknowledgements

This report is being supported by the Bill & Melinda Gates Foundation and the Foreign, Commonwealth and Development Office. The writing of this report, the underlying methodology development and the research were conducted by the Access to Nutrition Initiative Infant and Young Child Nutrition project team, which consists of Efi Chatzinikolaou, Lucy Cosenza, Daniela Hernández Morales, Ludovica Ibba, Nadine Nasser, Marina Plyta, Irene Santoro, and Mark Wijne. We would also like to thank colleagues for their support in various steps of the process: Babs Ates, Freddie von Kaufmann, Eaindra Aye, Aurélie Reynier, Omari Palmer, Vrinda Poojari, and Philip Eisenhart as well as Juliana Constantino, who supported the research as part of her internship at ATNI. The ATNI team drew on the expertise and advice of the ATNI BMS expert group members Elizabeth Zehner, Laurence Grummer-Strawn (observer), Linda Meyers, Shelly Sundberg, and Shiriki Kumanyika and would like to thank them for their valuable input throughout this research and the underlying methodology. The views expressed in this report, however, do not necessarily reflect the views of the group's members or their institution. Underlying data for the country studies has been sourced from Digimind, Innova Market Insights, and Nielsen Ad Intel International under license. ATNI would like to thank Kummer & Herman and Studio September for design, Wren Media for editing and proofreading, 73Bit for setting up the data platform and M&C Saatchi for communications.

Underlying data for the country studies has been sourced from Digimind, Innova Market Insights, and Nielsen Ad Intel International under license.

Photo Credits: © Cyril Chiquet

Pages: 63

Contents

Abbreviations	6
About the Access to Nutrition Initiative	7
Executive summary	8
1. Introduction	11
2. Context	13
2.1 The importance of optimal infant and young child nutrition	13
2.2 Why is the use of BMS products increasing?	14
2.3 International recommendations on responsible BMS marketing	15
3. Approach to company assessment	17
4. Companies' overall performance against the Code	19
5. Detailed results: BMS country studies	21
5.1 Introduction to the BMS country assessments	21
5.2 Country selection	21
5.3 Company presence	21
5.4 Scope of the BMS country studies	24
5.5 Scoring	25
5.6 Data verification	25
5.7 BMS country studies: combined results	26

Online monitoring results	32
Traditional media monitoring results	35
Product label results	37
5.8 Conclusions and recommendations on the BMS Country Studies	37
5.9 Limitations of the BMS Country Studies	38
6. Detailed results: BMS corporate profile	40
Companies' policies	40
Companies' engagement	42
Are companies' policies aligned to the Code across topics?	43
6.1.1 Overarching commitments	45
6.1.2 Advertising and promotions	45
6.1.3 Healthcare systems	45
6.1.4 Donations	46
6.1.5 Healthcare workers	47
6.1.6 Employee incentives	47
6.1.7 Labeling	48
6.1.8 Product quality	49
6.1.9 Implementation and monitoring	49
6.1.10 Lobbying and policy influence	49
6.1.11 Disclosure	50
Geographic penalty and final scores	51

6.2 Conclusions and recommendations on the BMS Corporate Profile	54
6.2.1 Recommendations for the companies	55
7. Conclusions and recommendations	57
Recommendations	58
8. References	61

Abbreviations

ATNI	Access to Nutrition Initiative
BMS	Breast-milk substitutes
CF	Complementary foods (commercially produced)
the Code	International Code of Marketing of Breast-milk Substitutes
FSMP	Formula for special medical purpose
FUF	Follow-up formula
GUM	Growing-up milk
IF	Infant formula
NGO	Non-governmental organization
UNICEF	United Nations Children's Fund
WHA	World Health Assembly
WHO	World Health Organization

About the Access to Nutrition Initiative

The Access to Nutrition Initiative (ATNI) is a global nonprofit established in 2013 to transform markets so they provide more nutritious, affordable, and sustainable foods for all. ATNI empowers key actors in the global food system and at national levels – especially industry and investors – to accelerate access to nutritious, affordable, and sustainable foods for all. ATNI – which is funded by governments and philanthropies – is dedicated to objectively assessing and improving the contribution made by the private sector to addressing global nutrition challenges. ATNI designs and regularly publishes various indexes and other private sector accountability tools which measure and track, over time, the extent to which companies are working to increase consumers' access to healthy foods and responsibly exercising their influence on consumer choice and behavior.

Executive summary

A person's first 1,000 days, or the period from conception until age two, are the most crucial for the development of their brain, body, metabolism, and immune system. Breastfeeding provides unparalleled brain-building benefits and gives infants the healthiest start to life. The World Health Organization (WHO) recommends exclusive breastfeeding up to six months of age, with continued breastfeeding along with appropriate complementary foods (CF) up to two years of age or beyond. Inappropriate promotion of breast-milk substitutes (BMS) remains a threat to the protection and support of breastfeeding worldwide undermining informed choice among parents and caregivers and leading to suboptimal breastfeeding practice in high-income and low-income settings alike. Improving breastfeeding practices could save the lives of nearly 420,000 children and 90,000 mothers and prevent more than 4.6 million cases of childhood obesity globally each year.¹ The 2023 Lancet series on breastfeeding estimated that USD 341.3 billion per year is lost globally from unrealized benefits to health and human development due to inadequate investment in protecting, promoting, and supporting breastfeeding.^a

For over a decade, ATNI has assessed how BMS companies comply with the 1981 International Code of Marketing of Breast-milk Substitutes ('the Code'), which provides guidelines for the responsible marketing of BMS, including CF for infants and young children. In this iteration, ATNI has expanded the coverage to include the 20 largest companies in the global baby food segment – 11 additional companies compared to the last assessment in 2021. Combined, the 20 companies hold an estimated share of at least 70% of the global baby food (BMS and CF) market. Eighteen of

these companies that sell BMS products, contributing to at least 5% of their global baby food sales, are included in this BMS Index – and, together, these companies are estimated to cover 76% of the global sales of BMS products. This BMS Marketing Index 2024 assesses the quality of companies' BMS marketing policies and management systems, their level of transparency, and their marketing practices in five global markets - China, Germany, Indonesia, Viet Nam, and the US. For this research ATNI assessed compliance with the International Code of Marketing of Breast-milk Substitutes, relevant subsequent WHA resolutions and WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children. ATNI did not assess compliance with local regulations or laws.

Since 2021, some improvements were measured related to updated policies and enhanced practices.

However, not one of the 18 companies assessed fully align with the Code. In addition, digital platforms have now emerged as the major driver for BMS marketing representing 61% of the incidences of non-compliance.

Not one of the 18 companies assessed in the BMS Index 2024 scores 100% compliance with the Code for their policies and practices. The highest total score is 37% for *FrieslandCampina* followed by four companies between 20% and 33% (*Danone, Hain Celestial, H&H, and Nestlé*). Three companies scored between 13% and 18% (*A2 Milk, HiPP, and Morinaga Milk*), two companies scored below 10% (*Abbott and Reckitt*), and eight companies (*Beingmate, Feihe, Hero, Junlebao, Lactalis, Mead Johnson China, Vinamilk, and Yili*) scored 0%.

^a The 2023 Lancet Series on Breastfeeding, available at:

<https://www.thelancet.com/infographics-do/2023-lancet-series-breastfeeding>.

A total of 1,614 incidences of inappropriate marketing of formula/non-compliance with the Code were identified across all companies in the five markets assessed. Of these, 61% occurred in online media and online retailers/points-of-sale (980 out of 1,614), while around 9% were observed on traditional media, mostly TV (138 out of 1,614). Approximately 31% of the incidences of non-compliance were identified on product labels (496 out of 1,614).

A total of 290 incidences of non-compliance with the Code concerned BMS products sold by *Danone*, 219 incidences concerned *Nestlé* BMS products, and, in descending order, 142 incidences were observed for *Abbott*, 135 for *Reckitt*, 120 for *Morinaga Milk*, 105 for *FrieslandCampina*, 104 for *Feihe* (all in China), 102 for *Mead Johnson China* (all in China), 87 for *Junlebao* (all in China), 81 for *Yili* (all in China), 65 for *HiPP*, 63 for *H&H* (all in China), 44 for *Vinamilk* (all in Viet Nam), 38 for *Beingmate* (all in China), 14 for *A2 Milk* (all in China), and five for *Hain Celestial* (in the US).

Nearly all product labels assessed (98%) were found to contain one or more incidences of non-compliance with the Code, like the inclusion of claims and the absence of a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond. Most observed incidences of non-compliance concerned growing-up milks (GUM, 893 out of 1,614). This suggests positive effects of more stringent regulations limiting the advertising and promotion of infant formula (IF) and follow-up formula (FUF) through traditional and online media channels.

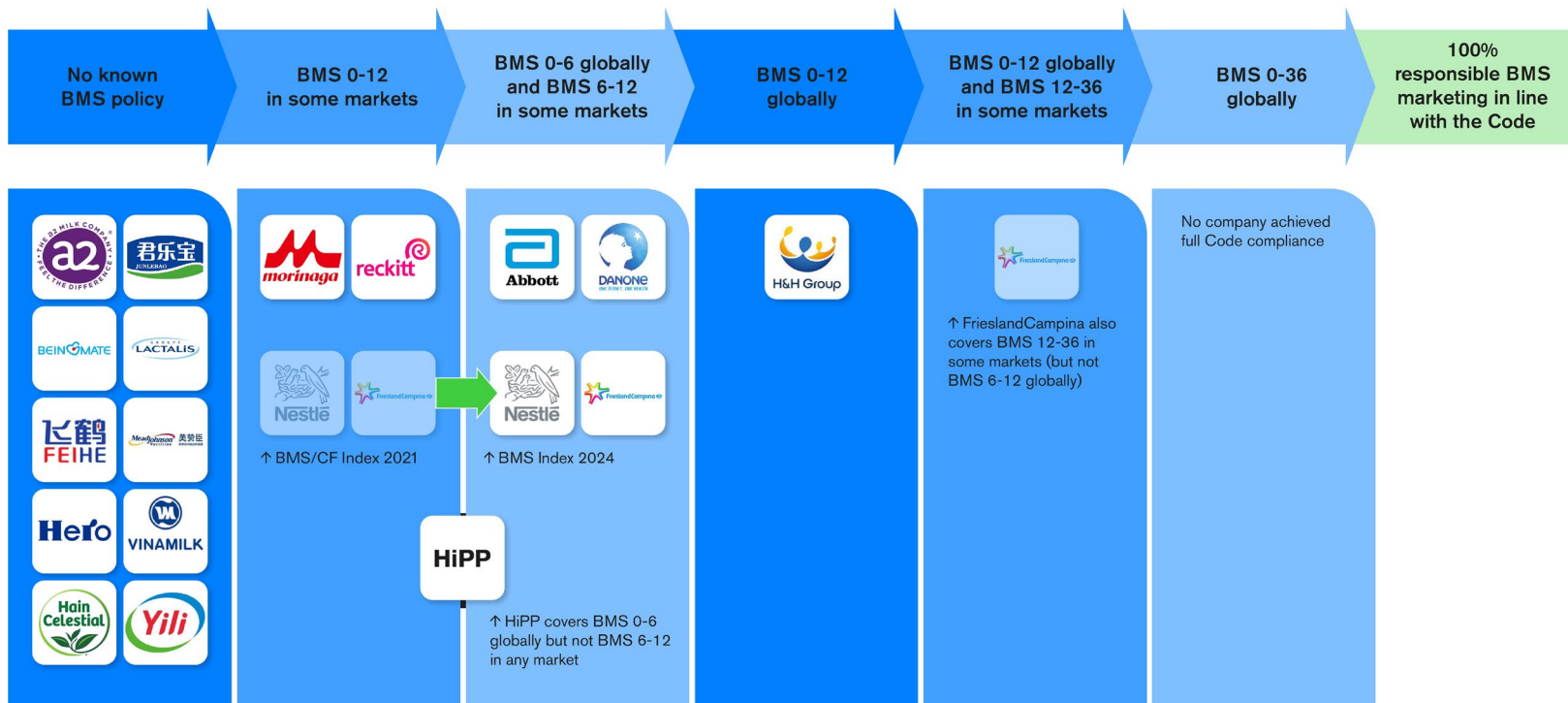
The Corporate Profile assessment of company policies and management systems showed eight out of 18 companies had a BMS marketing policy. *Abbott*, *Danone*, *Feihe*, *FrieslandCampina*, *Nestlé*, *Reckitt*, and *Yili* were previously assessed in the BMS/CF Index 2021, and it was noted that *Abbott*, *FrieslandCampina*, and *Nestlé* have revised their policies since 2021.

FrieslandCampina and *Nestlé* have improved the scope and application of their BMS marketing policies, taking closer steps towards achieving full Code compliance. Compared to the BMS/CF Index 2021 assessment, *FrieslandCampina* has improved the application of its BMS marketing policy to cover IF in all markets without exception. The company now upholds its commitments to the marketing of formula for children aged 6-36 months in countries where these products are covered by local regulations that are less strict than the company's global commitments. *Nestlé* has expanded the scope of its BMS marketing policy to cover IF for infants aged 0-6 months (but excluding formulas for special medical purposes) in all markets without exception and continues to cover FUF for older infants aged 6-12 months only in some markets.

FrieslandCampina shows the highest Corporate Profile score for policies and management systems (64%) – reflecting the commitments around the different provisions of the Code, and the extent to which commitments are upheld for different product categories and across the geographies/markets it operates in – followed by *H&H* (41%) and *Danone* (39%).

These results show the urgency with which companies, investors, policy makers, and civil society organizations must double down efforts to achieve optimal infant and young child nutrition goals and ensure compliance with the Code and relevant national legal measures. These goals include those set by WHO for 2025 to achieve higher levels of exclusive breastfeeding globally and combat growing levels of overweight and obesity and reduce deaths and illness from diet-related chronic diseases.

Status of companies' policies towards Code compliance in 2024



Note: each step shows the age range the product is intended to e.g BMS 0-12, BMS intended for infants and young children 0-12 months

1. Introduction

The Access to Nutrition Initiative (ATNI) is dedicated to objectively assessing and improving the contribution made by the private sector to addressing global nutrition challenges. ATNI does this by designing and regularly publishing various indexes and other private sector accountability tools. These indexes and tools measure and track, over time, the extent to which companies are working to increase consumers' access to healthy foods and responsibly exercising their influence on consumer choice and behavior.

One of ATNI's core activities is assessing the extent to which companies that make formulas and foods for infants and young children market their products in line with the prevailing international gold standard: the 1981 International Code of Marketing of Breast-milk Substitutes, including all subsequent, relevant World Health Assembly (WHA) resolutions up to WHA 71.9, collectively referred to hereinafter as 'the Code'. The Code lays provisions on the responsible marketing of breast-milk substitutes (BMS) and complementary foods (CF). For the purpose of this report, focused on the assessment of industrial food products, when the term complementary foods or the acronym CF is used, it refers to commercially or industrially produced CFs.

While the first 2013 ATNI assessments on this topic drew on reports from the International Baby Food Action Network, in 2016, the protocol by the Interagency Group on Breastfeeding Monitoring was followed. For the 2018 research, the BMS/CF Index 2021 and the present BMS Index 2024, the NetCode protocol/toolkit was used. Previously, ATNI published the results of these assessments in the Global Index reports. For the first time in 2021, ATNI published the results in a separate Index, called the BMS/CF Marketing Index 2021. Having been provided additional funding, and based on stakeholder input, ATNI expanded the coverage of this assessment for the BMS Marketing Index 2024 to include the 20 largest companies in the global baby food segment, 18 of which sell BMS products contributing to at

least 5% of their global baby food sales. Of these 18 companies, 10 also sell CF products that contribute 5% of their global baby food sales at minimum, while for two other companies, their global baby food sales are mainly CF products. Given the variation in the companies' portfolios and the differences in marketing requirements (BMS marketing is subject to stricter provisions than CF marketing), ATNI is presenting the assessments in this iteration in two separate Indexes: the BMS Marketing Index 2024 and the CF Marketing Index 2024. The division of the assessments was broadly welcomed by stakeholders during consultations that took place in 2022.

As the company scope has expanded for the BMS and CF Marketing Indexes 2024 (from nine companies in 2021 to 20 companies for this assessment), the geographic variability of the companies' markets warranted the selection of a minimum of five countries (compared to only two countries in prior country study assessments), to ensure each of the 20 companies is assessed on BMS/CF marketing in at least one country. The increased number of selected companies and countries assessed for the BMS and CF Marketing Indexes 2024, as well as the division of the assessments of BMS and CF marketing, warranted several adjustments to the methodology. ATNI undertook an [extensive consultation process](#) during which these changes were discussed.

This report presents the results of the BMS Marketing Index 2024, ATNI's fifth comprehensive assessment of the marketing policies and practices of the world's largest companies selling BMS products, to determine in how far they comply with the Code. In addition to this report, ATNI publishes [company scorecards](#) and [country study reports](#), where the results are described in more detail by company and by country, respectively.

For companies assessed on both the BMS and CF Marketing Indexes 2024, the results are presented separately for each assessment and will not be combined, as was done in the BMS/CF Marketing Index 2021.

Companies are expected to play their part in contributing to optimal infant and young child nutrition and achieving nutrition goals – particularly those

set by the World Health Organization (WHO) for 2025 and national governments to combat growing levels of overweight and obesity and reduce deaths and illness from diet-related chronic diseasesⁱⁱ – by complying with the Code and relevant national legal measures.

2. Context

2.1 The importance of optimal infant and young child nutrition

Nutrition plays a fundamental role in a child's optimal development within the first 1,000 days of life (from conception to age two).² During this period, breastfeeding is a crucial source of energy and nutrients for the infant and young child, meeting specific nutritional needs that lead to adequate growth and functional development.^{3,4} The World Health Organization (WHO) recommends that infants everywhere be exclusively breastfed for the first six months, after which point safe, adequate, and nutrient-rich foods should be introduced when breastmilk or milk formula alone are no longer adequate to meet the nutritional requirements of growing infants. This period is also known as complementary feeding, which generally starts at the age of six months and lasts up to 23 months of age, although breastfeeding may continue beyond this period, as recommended by WHO.⁵ Optimal breastfeeding has myriad benefits for infants and young children and their mothers. Breastmilk is the most sustainable and nutritious source of food for infants, carrying protective factors that safeguard children's health and their future well-being.^{6,7}

Adequate nutrition in the first 1,000 days lowers infant morbidity and mortality, reduces the risk of chronic disease, and fosters better overall development.⁸ Evidence shows that optimal breastfeeding can promote healthy brain development, prevent the triple burden of malnutrition, and protect against gastrointestinal infections.^{9,10} Moreover, in infants, breastfeeding is associated with risk reduction of non-communicable diseases later in life, such as type 2 diabetes and overweight and obesity.¹¹ Breastfeeding can also help infants' health in areas of the world where hygiene is inadequate and the availability of, and access to, food is poor.^{12,13} In these circumstances, breastfeeding can protect infants and young children

against undernutrition, infectious diseases, and death by guaranteeing a safe, nutritious, and accessible food.^{14,15} In mothers, breastfeeding is associated with improved birth spacing and prevention of chronic diseases, such as breast cancer and cardiovascular diseases, as well as a possible risk reduction of diabetes and ovarian cancer.^{16,17} According to the Cost of Not Breastfeeding tool and based on the latest estimates from 2022, nearly 500,000 children and almost 100,000 women die globally each year due to inadequate breastfeeding in accordance with WHO recommendations.¹⁸ Increasing breastfeeding rates globally and improving infant and young children's diets can help children thrive across generations, while enhancing prosperity in families and creating productive workforces and powerful economies.¹⁹

Due to the sub-optimal breastfeeding rates worldwide and continuing infant mortality and poor health outcomes, in 2014, WHO set a global target for 2025 of achieving 50% exclusive breastfeeding in the first six months of age in all countries and regions.²⁰ This target was extended in 2016 to at least 70% exclusive breastfeeding by 2030.²¹ The latest United Nations Children's Fund (UNICEF) estimates of exclusive breastfeeding rates during the first six months of life show that, globally, as of 2022, exclusive breastfeeding is up to 48% and on track to reach the 2025 target – but remains far from the 2030 target. It is worth noting there are regional disparities, as six of the nine global UNICEF regions have rates below 50%, while Western Europe has no regional data on these practices; and only South Asia and Eastern and Southern Africa currently surpass the 2025 target.²²

These rates are greatly influenced by structural barriers which challenge the breastfeeding environment, i.e. gender inequities, disruptive sociocultural infant-feeding norms, urbanization and income growth, corporate marketing practices, non-strict maternity and breastfeeding protection policies in workforces, and the undermining of breastfeeding in healthcare environments.²³ These barriers place a strong influence on the main settings of breastfeeding, such as household, workplace, and healthcare systems by creating a sub-optimal environment for mothers to continue breastfeeding,

thus opting for breast-milk substitutes (BMS) for sources of food and nutrition.²⁴ Based on WHO's definition, BMS products include any milks (or products that could be used to replace milk, such as fortified soya milk alternatives), in either liquid or powdered form, that are specifically marketed for feeding infants and young children up to the age of three years.

Addressing these different barriers and supporting lactating mothers is necessary to successfully maintain adequate breastfeeding practices. Evidence has shown that the inappropriate marketing of BMS undermines breastfeeding, revealing that BMS sales were inversely associated with breastfeeding at one year of age in 126 countries.²⁵ Countries should have strong legislation in place to curb inappropriate corporate marketing of BMS, and companies should ensure their BMS products are marketed responsibly in line with public health recommendations.

2.2 Why is the use of BMS products increasing?

Global retail sales of BMS products were estimated to amount to almost USD 54 billion in 2021.^b The global BMS market is forecast to see continued growth across all types of formula, reaching a total market value of over USD 61 billion by 2028. It is worth noting that, currently, almost 40% of global BMS sales concern growing-up milks (GUM) – milks intended for young children between one to three years of age – and their growth is projected to be higher over the years compared to other types of formula intended for infants under one year of age. Sales of formulas for special medical purposes have also been steadily on the rise.²⁶

^b Euromonitor International Limited, Dairy Products and Alternatives Edition, 2021 data, © All rights reserved

The increased use of BMS products is due to many reasons. For instance, the misinterpretation of unsettled infant behavior plays a role in the early consumption of BMS, and is one of the most common reasons for health appointments.²⁷ These behaviors – i.e. persistent crying, fussiness, and short night-sleep – are interpreted by caregivers and health workers as signs of digestive problems and/or adverse reactions to breastmilk, which has led to the perceived need for BMS supplementation.²⁸ There are various reasons why infants present unsettled behaviours, including hunger, discomfort, and temperature changes, and are completely normal for the early life stages. Alongside these infant behaviours, at the individual level, mothers can experience mental health challenges that can induce self-reported insufficient milk, which have not yet been rightfully addressed by healthcare systems.²⁹ Therefore, in the search for infant health and lack of support and guidance, parents tend to opt for BMS products.³⁰

After birth, most infants receive some breastmilk; however, most of these children are not exclusively breastfeeding or continuing to breastfeed as long as recommended.³¹ Nonetheless, mothers who wish to continue breastfeeding are faced with structural, socio-cultural, and individual barriers which diminish breastfeeding rates and promote the transition to BMS consumption, as described earlier.

Concurrently, the BMS market and product consumption are increasing at accelerated rates due to higher demand.³² The inappropriate marketing of BMS products has been proven to contribute to increased product sales and decreasing levels of breastfeeding.³³ Marketing of BMS, which includes advertising, promotion, and some information presented on labels, significantly shapes caregivers' perceptions by acting as an influential source of information.³⁴ Studies show that the BMS industry is increasingly using digital marketing across an extensive range of online channels and social

media platforms.³⁵ Digital marketing uses digital technology tools that can be found in the forms of online advertising, promotion, and information presented by social media accounts, influencers, and pop-up advertisements, amongst others, that can be strongly engaging, persuasive, cost effective, and not easily recognizable as BMS promotions.³⁶

Social media posts containing a reference to BMS products are three times more likely to reach individuals compared to posts regarding breastfeeding, according to a recent WHO report on the scope of digital marketing.³⁷ A wide range of techniques are used for BMS digital marketing, such as parenting apps, virtual baby clubs, algorithms driven by internet user data, social media influencers, and publication with scientific education, amongst others.³⁸ These methods are increasing sales by influencing consumers' purchasing behavior. As current marketing strategies are not being held accountable for in digital environments, WHO recently developed guidance on regulatory measures aimed to restrict and control the digital marketing of BMS.³⁹

The responsible marketing of BMS products is imperative to ensure they are not promoted in any way that would influence caregivers' decisions in feeding their infants and young children.

2.3 International recommendations on responsible BMS marketing

WHO has been responding to concerns about irresponsible marketing of BMS since 1981, when the International Code of Marketing of Breast-milk Substitutes was adopted by the World Health Assembly (WHA) as a minimum requirement to protect and promote appropriate infant and young

child feeding. It sets out, inter alia, provisions on the appropriate labeling of BMS and restrictions on the promotion of these products in public settings and within the healthcare system.⁴⁰ Since 1981, several WHA resolutions have been passed that augment or reinforce the original Code given evolving marketing challenges.⁴¹ Adopted in May 2016, WHA Resolution 69.9 extended the scope of products covered by the Code to include any milks (or products that could be used to replace milk, such as fortified soya milk alternatives), in either liquid or powdered form, that are specifically marketed for feeding older infants and young children up to the age of three years.⁴² BMS products covered by the Code include infant formula (IF, intended for infants younger than six months of age),^c follow-up formula (FUF, intended for older infants between six months up to one year of age), and GUM or toddler milks (intended for young children between one and three years of age).

The latest WHA Resolution 75(21) of May 2022 called for the development of the guidance for regulatory measures aimed at restricting the digital marketing of BMS to ensure that existing and new regulations designed to implement the International Code of Marketing Breast-milk Substitutes and subsequent relevant WHA resolutions adequately address digital marketing practices.⁴³

For the Code to serve its purpose and give legal effect, countries are required to legislate laws and regulations that are in complete accordance with the Code and rigorously monitor its compliance.

The latest 2022 Status of the Code report showed that 74% (144) of all WHO Member countries (194) have implemented measures to adhere to at least some of the Code's provisions. Of these countries, 22% have legislation substantially aligned with the Code, 28% moderately aligned with the Code,

^c There are various types of IF. As noted in the 2017 NetCode Protocol for Periodic Monitoring, the upper age indication on the product label varies from country to country but is usually between six and 12 months.

and 49% have some provisions of the Code, leaving 50 countries with no legal measures at all.⁴⁴ Nonetheless, there has been some improvement in the past five years, whereby 26 countries have updated their legislation or enacted new ones. Consequently, these countries are more likely to cover BMS for children up to 36 months of age and address subsequent WHA resolutions. However, over 40 years after the Code was released, international efforts to encourage all countries to integrate the Code into national legislation have not been sufficient. Thus, it is essential that companies selling BMS products address these provisions and update their policies and improve their practices to fully comply with the Code. Article 11 of the Code clearly states that manufacturers and distributors of products within the scope of the Code should regard themselves as responsible for monitoring their marketing practices according to the principles and aim of the Code, and for taking steps to ensure their conduct at every level conforms to them.⁴⁵ BMS companies' demonstration of their commitment is important to protect breastfeeding, support optimal nutrition and safeguard the health of infants and young children through responsible marketing practices.

3. Approach to company assessment

The 18 companies assessed on ATNI's BMS Marketing Index 2024 represent 76% of the global BMS market.^d The companies are assessed on two main components:

- The Country Studies assessment, which measures companies' marketing practices in selected countries. For this Index, five countries were selected representing the companies' primary baby food markets: China, Germany, Indonesia, Viet Nam, and the US.
- The Corporate Profile assessment, which examines global corporate policies and procedures and level of disclosure.

The Corporate Profile and Country Studies evaluate the extent to which company policies and practices align with the various provisions of the Code. While the Corporate Profile assesses company policies and commitments on all aspects of the Code, the Country Studies assesses marketing practices against specific provisions of the Code.

The **BMS Marketing Index** assesses company standards on the marketing of breast-milk substitutes, hereinafter referred to as BMS products. These include any milks (or products that could be used to replace milk, such as fortified soya milk alternatives), in either liquid or powdered form, that are specifically marketed for feeding older infants and young children up to the age of three years; namely:

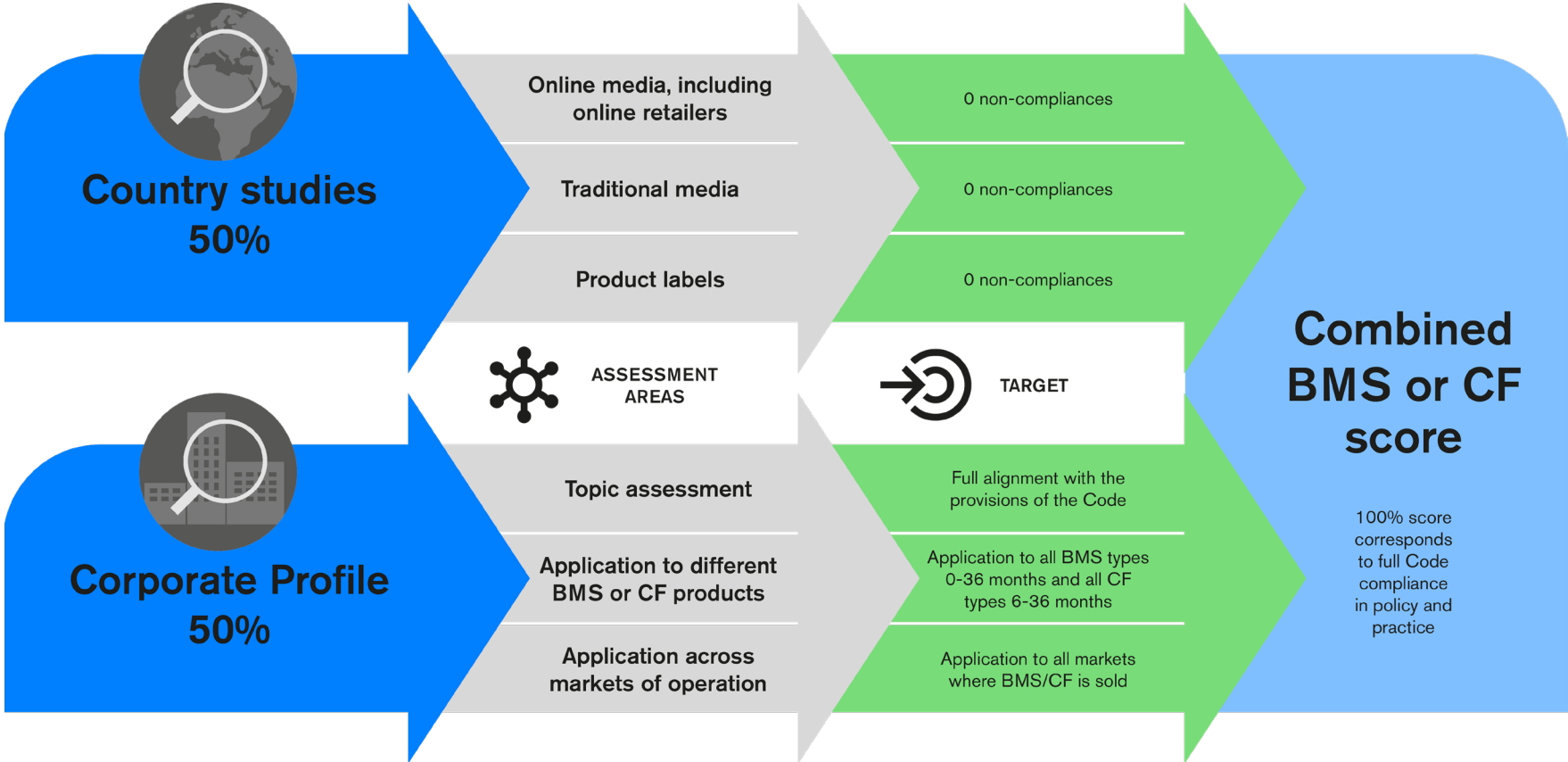
- **IF** (infant formula, intended for infants younger than six months of age)

- **FUF** (follow-up formula, intended for older infants between six months up to one year of age)
- **GUM** (growing-up milks) or toddler milks (intended for young children between one and three years of age)

The [methodology](#) for the BMS and CF Marketing Indexes 2024, as shown in **Figure 1**, includes additional information about the companies selected and the respective Index(es) they are assessed in, as well as the basis and nature of the assessments for each component and how they feed into the overall Indexes.

^d Euromonitor International Limited, Dairy Products and Alternatives Edition, 2021 data, © All rights reserved

Figure 1. ATNI's methodology for the BMS Marketing Index



4. Companies' overall performance against the Code

The overall results of the BMS Marketing Index 2024 are set out in **Table 1**, alongside the Country Studies score and Corporate Profile score. Each Country Studies score, and Corporate Profile score contributes to half of the total combined BMS score – except for the companies Lactalis and Hero. As Lactalis and Hero don't sell BMS in any of the five countries selected for this Index (China, Germany, Indonesia, the US, and Viet Nam), they were not assessed on this component and their total BMS score is therefore only based on their Corporate Profile score.

A total BMS score of 100% corresponds to full compliance with the Code in both policy and practice.

A score of 100% on the Country Studies corresponds to full compliance with specific provisions of the Code that were assessed as part of this research, whereas a score of 0% indicates at least 20 incidences of Code non-compliance identified in each of the markets assessed.

A score of 100% on the Corporate Profile corresponds to full compliance with the Code, whereas a score of 0% indicates no policy or related commitments were found that align with the Code.

As seen in **Table 1**, none of the companies were found to be fully compliant with the Code in policy nor practice. The highest total BMS score is 37% for *FrieslandCampina*. Meanwhile, four companies scored between 20% and 33% (*Danone*, *Hain Celestial*, *H&H*, and *Nestlé*), three companies scored between 13% and 18% (*A2 Milk*, *HiPP*, and *Morinaga Milk*), two companies

scored below 10% (*Abbott* and *Reckitt*), and eight companies scored 0% (*Beingmate*, *Feihe*, *Hero*, *Junlebao*, *Lactalis*, *Mead Johnson China*, *Vinamilk*, and *Yili*).

There is notable variation in a company's performance on the Corporate Profile and Country Studies components. Companies that scored relatively higher on the Corporate Profile component had lower scores on the Country Studies, reflecting gaps in how companies apply their BMS marketing policies as well as gaps in full Code compliance. On the other hand, some companies that had relatively low scores on the Corporate Profile component had higher scores on the Country Studies assessment, which could be explained by the fact these companies were assessed in fewer markets or where they have relatively lower shares of the BMS market, such as the case of *Hain Celestial*. A number of companies scored low on both components.

Companies' performance on each of the components, Country Studies and Corporate Profile, is described in further detail in the next sections.

Table 1. Total combined BMS scores per company

Companies	Country Studies score	Corporate Profile score	Total combined score
A2 Milk	33.0%	0.1%	16.5%
Abbott	0.0%	18.5%	9.2%
Beingmate	0.0%	0.2%	0.1%
Danone	8.3%	38.9%	23.6%
Feihe	0.0%	0.2%	0.1%
FrieslandCampina	11.0%	63.9%	37.4%
H&H	0.0%	40.8%	20.4%
Hain Celestial	66.0%	0.1%	33.1%
Hero	N/A	0.1%	0.0%
HiPP	22.0%	3.8%	12.9%
Junlebao	0.0%	0.0%	0.0%
Lactalis	N/A	0.1%	0.0%
Mead Johnson China	0.0%	0.2%	0.1%
Morinaga Milk	33.0%	2.3%	17.6%
Nestlé	6.6%	35.7%	21.1%
Reckitt	0.0%	11.5%	5.7%
Vinamilk	0.0%	0.1%	0.0%
Yili	0.0%	0.1%	0.0%

5. Detailed results: BMS country studies

5.1 Introduction to the BMS country assessments

This section presents a summary of the five in-country assessments carried out in China, Germany, Indonesia, the US, and Viet Nam by ATNI for the BMS Marketing Index 2024. The purpose of these studies was to assess, within the selected markets, companies' compliance with the Code – namely Articles 5 and 9 and Recommendations 4, 5, and 6 of the guidance on ending the inappropriate promotion of foods for infants and young children, supported by WHA Resolution 69.9, which address the public promotion of BMS and their appropriate labeling. Detailed information on companies' performance in each country is presented in ATNI's country reports, available [here](#).

5.2 Country selection

Five countries were chosen for this BMS marketing assessment. The increase in the number of country assessments from the previous BMS/CF Marketing Index, published in 2021, which included Mexico and the Philippines (available [here](#)), reflects the broader scope and geographic variability of the companies in the BMS and CF Marketing Indexes 2024.

The selected countries were China, Germany, Indonesia, Viet Nam, and the US. The selection process aimed to capture each of the 20 companies assessed on the BMS and CF Marketing Indexes in at least one of their primary baby food markets, representing between 10% and 100% of their global baby food market share, including BMS and CF products. Additionally,

the aim was to ensure a balanced representation by considering other factors, like exclusive breastfeeding rates, the national Code implementation, and practical considerations such as safety.

5.3 Company presence

In-country assessments were carried out for 16 out of the 18 companies in scope for the BMS Marketing Index 2024. *Lactalis* and *Hero* were not included as they do not sell any BMS products in the five countries selected.

In total, 11 companies were assessed in China, seven in Viet Nam, six in Indonesia, five in the US, and three in Germany. **Table 2** illustrates companies' presence in each country. *Nestlé* was the only company assessed in all five selected countries. *Danone* was not assessed in Viet Nam but was present in the remaining four countries. *Abbott*, *FrieslandCampina*, *HiPP*, and *Reckitt* were each assessed in three countries, while *Morinaga Milk* was assessed in two countries. *Feihe*, *A2 Milk*, *Beingmate*, *H&H*, *Yili*, *Mead Johnson China*, and *Junlebao* were assessed in China; *Hain Celestial* was assessed in the US; and *Vinamilk* was assessed in Viet Nam.

Table 2. Summary of company presence

	a2 Milk	Abbott	Beingmate	Danone	Feihe	FrieslandCampina	H&H	Hain Celestial	HIPP	Junlebao	Mead Johnson China	Morinaga Milk	Nestlé	Reckitt	Vinamilk	Yili
China	✓		✓	✓	✓	✓	✓		✓	✓	✓		✓			✓
Germany				✓					✓				✓			
Indonesia		✓		✓		✓						✓	✓	✓		
US		✓		✓				✓					✓	✓		
Viet Nam		✓				✓			✓			✓	✓	✓	✓	

Table 3. Estimated BMS market shares per country*

Companies	China		Germany		Indonesia		US		Viet Nam		Estimated combined share of the company's global BMS sales
	BMS market share	Proportion of global BMS sales	BMS market share	Proportion of global BMS sales	BMS market share	Proportion of global BMS sales	BMS market share	Proportion of global BMS sales	BMS market share	Proportion of global BMS sales	
A2 Milk	2%	87%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	87%
Abbott	N/A	N/A	N/A	N/A	1%	<1%	43%	48%	26%	6%	54 %
Beingmate	2%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%
Danone	11%	42%	25%	2%	35%	11%	1%	1%	N/A	N/A	56%
Feihe	19%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%
FrieslandCampina	5%	63%	N/A	N/A	12%	12%	N/A	N/A	14%	7 %	83%
H&H	4%	99%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	99%
Hain Celestial	N/A	N/A	N/A	N/A	N/A	N/A	1%	100%	N/A	N/A	100%
HiPP	< 5%	No information	17%	25%	N/A	N/A	N/A	N/A	< 5%	No information	>25%
Junlebao	7%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%
Mead Johnson China	6 %	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%
Morinaga Milk	N/A	N/A	N/A	N/A	18%	72%	N/A	N/A	< 5%	No information	>72%
Nestlé	10%	34%	23%	38%	25%	7%	<5%	No information	10%	1%	>80%
Reckitt	N/A	N/A	N/A	N/A	4%	2%	38%	57%	14 %	5%	63%
Vinamilk	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	18%	100%	100%
Yili	13 %	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%
Total BMS market share per country	>79%		65%		93%		>83%		>82%		

* Euromonitor International Limited, Dairy Products and Alternatives Edition, 2021 data, © All rights reserved

Note: N/A indicates that the company does not sell in this country.

Table 3 presents the companies' estimated BMS market shares per country, and the proportion of their global BMS sales in these markets. The five selected countries represent at least 25% and up to 100% of the companies' global BMS sales.

- Eleven companies assessed account for over 79% of China's total BMS market, with *Feihe* holding the highest market share (19%). China represents the main BMS market for seven of these companies.
- In Germany, the total BMS market share accounted for by the three companies assessed in the country amounts to approximately 64%. *Danone* and *Nestlé* are the primary players in Germany's BMS market, each holding approximately 20-25% of the market share. The country also represents around 25% of *HiPP*'s global BMS sales.
- In Indonesia, *Danone* holds the highest BMS market share (35%), and the six companies assessed in the country account for about 93% of the total BMS market. The Indonesian market is one of *Morinaga Milk*'s biggest markets, representing over 72% of the company's global BMS sales.
- *Abbott* and *Reckitt* dominate the BMS market in the US, each holding approximately 35-45% of the market share. The US is *Hain Celestial*'s main BMS market, despite the company holding relatively low shares in the country's BMS market. The total BMS market share accounted for by the five companies assessed in the US is greater than 83%.
- In Viet Nam, *Abbott* holds the largest portion of the BMS market with a share of 26%, and the total BMS market share attributed to the seven companies assessed in this country is greater than 82%. *Vinamilk* only sells BMS in Viet Nam.

5.4 Scope of the BMS country studies

The 2024 in-country assessments review marketing practices primarily through online points-of-sale, traditional and online media outlets, and product labels. Data collection utilizes adapted forms from the 2017 NetCode toolkit, focusing on compliance with the Code. Due to increased company and country assessments, online tools were employed for data collection.

The assessment methods include social listening, traditional media monitoring, and reviewing product labels.

Social listening monitors companies' online marketing activities to determine their level of compliance with the Code, identifying paid advertisements and promotions for BMS products across websites, social media, and online retail platforms. Traditional media monitoring evaluates advertisements on broadcast media and print for compliance with the Code. Product labels were reviewed based on a third-party database's product information and assessed for compliance with the Code. ATNI's country studies do not assess against local regulations. The assessment period for each method varied, with social listening spanning eight weeks, between May 12 2023 and July 6 2023; traditional media monitoring a total of six months, between January 1 2023 and June 30 2023; and product label reviews targeted products launched between March 2020 and February 2023.

More information on the assessment methods can be found in the [country reports](#) and in ATNI's full [methodology](#) for the BMS and CF Marketing Indexes 2024.

5.5 Scoring

The country scores are based on the sum of observed incidences of non-compliance across the three assessment methods, with higher observed incidences of non-compliance indicating lower compliance with the Code and resulting in lower scores. Conversely, full compliance is achieved when no incidences of non-compliance are observed across online and traditional media and product labels. No differential weighing is applied to the findings across different forms of marketing. Hence, levels of non-compliance were determined solely by the number of incidences of non-compliance, rather than by the normalized score, as calculated in previous methodologies.

The resulting score is thus calculated by:

- Aggregating the total number of incidences of non-compliance with the Code identified in each country.
- Assigning a rating for the level of compliance in each country and a final percentage score, as shown in **Table 4** below.

The same level of compliance ranges, as indicated in **Table 4**, were used for all countries in scope, consistent with previous studies. The final BMS country score for each company was derived from these compliance ratings, which were averaged across all countries where the company was assessed, except in cases where companies were assessed only in one country.

Table 4. Company country scores based on observed incidences of non-compliance with the Code

Observed incidences of non-compliance with the Code in a country	BMS country score
0	100%
1 - 10	66%
11 - 20	33%
> 20	0%

5.6 Data verification

Upon completion of the data collection, ATNI informed all 16 companies separately about the assessments and the countries they took place in. As part of ATNI's fact-checking process, each company was requested to confirm if the identified brands correctly represented the markets studied during the research time frame, and to confirm if there were any instances of parallel (illegal) imports, which were subsequently excluded from the assessment. As the verification process entails fact-checks and requests for additional information, it has no influence on the assessments and findings.

For the label assessment, companies were specifically requested in some cases to share additional product information and materials that could not be found in the public domain, if images of product packages were missing or when images available to ATNI were not clear enough to extract the information needed to complete the assessments. Seven out of the 16 companies assessed confirmed information with ATNI and shared additional information by sending product labels or images. These companies were *Abbott*, *Danone*, *FrieslandCampina*, *H&H*, *HiPP*, *Nestlé*, and *Reckitt*. It should be noted that the additional information on product labels shared by *Danone*, *HiPP*, and *Nestlé* was incomplete for some countries. *Reckitt*

communicated with ATNI after the verification phase was completed and when the assessments were being finalized, at which stage ATNI only accepted images of product labels in Viet Nam, where all assessments had been incomplete.

Companies were also asked to confirm whether they had contractual relationships with parenting websites (targeting parents/caregivers of infants and young children) in situations where company-related incidences of non-compliance were found, and with online retailers where point-of-sale promotions were monitored. As this is an assessment of company practices, ATNI verified if companies had any agreements with parenting websites and online retailers, or influence on their marketing practices, to determine whether the companies were in any way responsible for the findings and if they should thus be attributed to the company or excluded from the assessments.

Only five of the 16 companies provided information related to the online findings: *Abbott, Danone, FrieslandCampina, H&H, and Nestlé*.

If companies did not respond to ATNI's requests, all identified incidences of non-compliance were included in the assessments, and where clear images were missing, the label assessments remained incomplete and are noted as such.

During the fact-checking process, companies can review their findings, along with the evidence of all observed incidences of non-compliance in the form of images and screenshots, videos, and links. ATNI follows an independent and transparent approach with the companies to confirm to them ATNI's observations of non-compliance and where they were identified. These details also serve to provide the companies with the information they need to take corrective action.

More detailed information on the companies' level of engagement in relation to the findings on product labels, parenting websites, and online retailers in each country can be found in [individual country reports](#).

5.7 BMS country studies: combined results

Table 5 summarizes the number of incidences of non-compliance identified out of the total number of products and promotions assessed and the resulting country scores (based on **Table 3**), as well as the average country score of the companies' performance across the different markets assessed.

Average country scores vary from 0% to 66%, highlighting considerable variation in the number of products and promotions found across different companies and countries, as well as the fact that none of the companies achieved complete compliance with the Code in any of the countries assessed in this study.

The only company that achieved an average score of 66% was *Hain Celestial*, based on assessing the company's performance in the US exclusively, where a total of five incidences of non-compliance were observed. It's important to highlight that *Hain Celestial* holds a small share of the US BMS market, accounting for less than 2%, which could impact the number of findings. Moreover, while no incidences of non-compliance were observed on online media outlets and traditional media, all five product labels assessed included an average of 10 observations of non-compliance each, making *Hain Celestial* the company with the highest average number of incidences of non-compliance per label (refer to **Table 10** for more detailed results on product label assessments).

A2 Milk, only assessed in China, obtained an average score of 33%. Despite *A2 Milk*'s sales in China accounting for nearly 90% of its global BMS market share, its market share in China is relatively minor, comprising less than 2%. A total of 14 incidences of non-compliance were observed for *A2 Milk*'s products in China, including 12 incidences of promotional content found online and two labels with one or more incidences of non-compliance.

The highest geographic variation in the number of assessed BMS products and promotions was identified for *Morinaga Milk and HiPP*, resulting in an average score of 33% for *Morinaga Milk* and 22% for *HiPP*.

Morinaga Milk scored 0% in Indonesia, where it holds between 18% of the BMS market share, with 118 incidences of non-compliance identified. One hundred of these 118 incidences were found online, while nine corresponded to product labels with at least one incidence of non-compliance. In Viet Nam, where *Morinaga Milk* accounts for less than 5% of the BMS market, two non-compliant product labels were identified, resulting in a score of 66%.

HiPP obtained a score of 0% in China and Germany and a higher score of 66% in Viet Nam. A total of 23 incidences of non-compliance were identified in online media and retailers in China, while six labels with one or more observations of non-compliance were assessed in Viet Nam. In both countries, *HiPP* accounts for less than 5% of the BMS market, which may explain the lower number of products assessed and promotional content found. In Germany, where *HiPP*'s BMS market share is higher (17%), 24 product labels were found to have at least one incidence of non-compliance. Additionally, 11 instances of online promotions and one advertisement on traditional media were identified.

FrieslandCampina scored 0% in China and Viet Nam but obtained a higher score in Indonesia (33%), resulting in an average score of 11%. In China, where the company holds a BMS market share of 5%, 69 incidences of non-compliance were observed, most of which were found online (62 out of 69). In Viet Nam and Indonesia, where the company accounts for 10-15% of the local BMS market, 23 and 13 incidences of non-compliance were identified, respectively. These incidences included non-compliant product labels and promotional content found in online and traditional media.

Nestlé, the only company assessed in all five countries, holds notable market shares in Germany and Indonesia (20-25%) and lower shares in China and

Viet Nam (10% in each of these countries). *Nestlé*'s score in these four countries is 0%. In the US, where the company achieved a higher score (33%), it accounts for less than 5% of the BMS market. The average score across countries stands at 7%. Incidences of non-compliance were found on product labels, as well as online and traditional media, with proportions varying per country.

Danone holds the highest BMS market share in Indonesia (35%) and notable market shares in Germany (25%) and China (11%). However, in the US, its market share is less than 1%. The varying levels of company presence in these markets are evident in the number of product labels assessed and promotional content found. Specifically, 11 incidences of non-compliance were identified in the US, corresponding to a score of 33%; 51 incidences in China; 80 incidences in Germany; and the highest number, 148, was observed in Indonesia – which all correspond to a score of 0% each, resulting in an average score of 8%. Incidences of non-compliances mainly occurred in product labels and online media, except in Indonesia, where a considerable number of promotions were observed in traditional media, too.

Reckitt and *Abbott* displayed non-compliance in their BMS products across all the three countries they were assessed in (Indonesia, the US, and Viet Nam), resulting in an average country score of 0%. These two companies dominate the US BMS market, with estimated shares of 35-45% each, and hold notable shares in Viet Nam (26% for *Abbott* and 18% for *Reckitt*) and smaller ones in Indonesia (less than 5%). For both companies, incidences of non-compliance were found mainly on product labels in the US, and on online media in Indonesia and Viet Nam.

The remaining companies were assessed in only one market each, where they all obtained a score of 0%. These included *Beingmate*, *Yili*, *Mead Johnson China*, *Junlebao*, *H&H*, and *Feihe* in China, and *Vinamilk* in Viet Nam. Among these companies, the highest market shares in China are held

by *Feihe* (19%) and *Yili* (13%). In Viet Nam, *Vinamilk* holds a market share of 18%, representing 100% of its global BMS sales.

Table 5. Number of incidences of non-compliance and in-country BMS scores by company

Companies	CHINA		GERMANY		INDONESIA		US		VIET NAM		Average country score
	Country score (%)	No. of incidences of non-compliance out of total no. of products/promotions assessed	Country score (%)	No. of incidences of non-compliance out of total no. of products/pr promotions assessed	Country score (%)	No. of incidences of non-compliance out of total no. of products/pr promotions assessed	Country score (%)	No. of incidences of non-compliance out of total no. of products/pr promotions assessed	Country score (%)	No. of incidences of non-compliance out of total no. of products/pr promotions assessed	
A2 Milk	33%	14/14	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	33%
Abbott	N/A	N/A	N/A	N/A	0%	42/42	0%	50/50	0%	50/50	0%
Beingmate	0%	38/38	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%
Danone	0%	51/51	0%	80/80	0%	148/148	33%	11/11	N/A	N/A	8%
Feihe	0%	104/104	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%
FrieslandCampina	0%	69/69	N/A	N/A	33%	13/13	N/A	N/A	0%	23/23	11%
H&H	0%	63/63	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%
Hain Celestial	N/A	N/A	N/A	N/A	N/A	N/A	66%	5/5	N/A	N/A	66%
HiPP	0%	23/23	0%	36/36	N/A	N/A	N/A	N/A	66%	6/6	22%
Junlebao	0%	87/90	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%
Mead Johnson China	0%	102/102	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%
Morinaga Milk	NA	N/A	N/A	N/A	0%	118/118	N/A	N/A	66%	2/2	33%
Nestlé	0%	44/44	0%	32/32	0%	84/88	33%	17/17	0%	42/42	7%
Reckitt	NA	N/A	N/A	N/A	0%	53/54	0%	40/40	0%	41/41	0%
Vinamilk	NA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	44/44	0%
Yili	0%	80/81	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%
Total	N/A	675/679	N/A	148/148	N/A	458/463	N/A	123/123	N/A	208/208	11%

Note: N/A indicates that the company does not sell in this country.

As illustrated in **Table 6**, a total of 1,614 incidences of non-compliance were identified across all companies in the five markets they were assessed in. Over 60% of these observations occurred in online media and retailers (980 out of 1,614), while around 9% were observed in traditional media (138 out of 1,614). Altogether, these 1,118 findings

relate to non-compliances with the Code that specifically pertain to **Article 5 and Recommendations 4, 5, and 6 of the guidance supported by WHA 69.9**. Approximately 31% of the incidences of non-compliance were identified on product labels (496 out of 1,614); these relate to non-compliances with the Code associated with **Article 9 and Recommendation 4 of the guidance supported by WHA 69.9**.

Table 6. Total number of incidences of non-compliance found per company on online media, traditional media, and product labels

Companies	Online media and retailers	Traditional media	Labels	Total
A2 Milk	12	0	2	14
Abbott	81	8	53	142
Beingmate	14	0	24	38
Danone	165	54	71	290
Feihe	73	0	31	104
FrieslandCampina	80	8	17	105
H&H	42	2	19	63
Hain Celestial	0	0	5	5
HiPP	34	1	30	65
Junlebao	39	5	43	87
Mead Johnson China	92	0	10	102
Morinaga Milk	100	9	11	120
Nestlé	109	25	85	219
Reckitt	91	9	35	135
Vinamilk	25	1	18	44
Yili	23	16	41	81
Total	980	138	496	1,614

Table 7 allows us to examine the occurrences of incidences of non-compliance based on product type. The vast majority applied to **growing-up milks (GUM)**, intended for young children between one and three years of age, with a total of 893 incidences of non-compliance, most of which were found online (approximately 80%). The second and third highest number of incidences of non-compliance applied to observations of **product brands associated with BMS^e** (263) and **infant formula (IF, 261)**, intended for infants from birth. While most observations of non-compliance related to specific product is promoted, but the observation is associated with a BMS brand. BMS product brands and GUM were found online (177 and 685, respectively), incidences of non-compliance related to IF were predominantly detected on product labels (219 on labels versus 42 online and none on traditional media). Lastly, out of the 197 incidences of non-compliance detected on **follow-up formula (FUF)**, intended for older infants from six months up to one year of age, 117 were identified on labels, 76 online, and four on traditional media.

Table 7. Number of incidences of non-compliance found by country and product type*

	CHINA	GERMANY	INDONESIA	US	VIETNAM	Total
Infant formula	82	45	25	73	35	261
Label	72	45	13	64	24	219
Online	10	0	12	9	11	42
Traditional	0	0	0	0	0	0
Follow-up formula	132	32	13	1	19	197
Label	66	26	10	1	14	117
Online	66	2	3	0	5	76
Traditional	0	4	0	0	0	4
Growing-up milk	428	19	298	12	135	893
Label	81	16	23	10	30	160
Online	339	3	238	2	103	685
Traditional	9	0	37	0	2	48
Product brand	33	52	123	36	19	263
Label	0	0	0	0	0	0
Online	18	52	56	34	17	177
Traditional	15	0	67	2	2	86
Total	676	148	459	123	208	1614

^e These relate to observations where no age is specified on a product or no

*Product brand relates to observations where no age is specified on a product or no specific product is promoted, but the observation is associated with a BMS brand

Online monitoring results

Table 8 summarizes the total number of online promotions detected during the research period related to BMS products sold by the 16 companies across the five countries assessed. These promotions are subcategorized in occurrences found throughout the web and social media, and those found on retail websites.

The highest number of online promotions observed was related to *Danone* BMS products, which were promoted in 165 occurrences across China, Germany, Indonesia, and the US. *Nestlé* products were associated with 109 online promotional activities in total across the five countries assessed, while *Morinaga Milk* was associated with a total of 100 online promotions in Indonesia and Viet Nam. For BMS products sold by *Mead Johnson China*, *Reckitt*, *Abbott*, *FrieslandCampina*, and *Feihe*, the number of online promotions found ranged from 73 (*Feihe* in China) to 92 (*Mead Johnson China* in China). Less than 50 online promotions were registered for products sold by *H&H* and *Junlebao* in China (42 and 39, respectively), and for products sold by *HiPP* in China, Germany, and Viet Nam (34). In Viet Nam, 25 online promotional activities were identified for BMS products sold by *Vinamilk*. Lastly, 23, 14, and 12 online marketing practices were found for products sold in China by *Yili*, *Beingmate*, and *A2 Milk*, respectively. No promotions were found online during the research period for *Hain Celestial* BMS products sold in the US.

The results presented in **Table 8** highlight how promotions were primarily found on company websites and social media platforms, which included Facebook, Instagram, and YouTube channels. In China, the social media platform monitored was Sina Weibo, the Chinese equivalent of Twitter. On

parenting websites, company-sponsored advertising was mostly found in Indonesia while none were found in China.

Overall, a smaller proportion of promotions were detected in online retailers for all companies, except for *Mead Johnson China*, *Feihe*, *Junlebao*, and *Beingmate* in China, and for *HiPP* in China, Germany, and Viet Nam. For these five companies, the number of point-of-sale promotions recorded in online retailers was higher than the advertisements found of their BMS products/brands on the web and social media.

Table 8. Summary of promotions found online (media and retailers)

Companies	Total number of promotions identified	Web and social media*		Online retailers**
		Number of online promotions found	% of promotions that included claims	Number of point-of-sale promotions found
A2 Milk (China)	12	9	67%	3
Abbott (Indonesia, US, Viet Nam)	81	75	88%	6
Beingmate (China)	14	0	N/A	14
Danone (China, Germany, Indonesia, US)	165	154	56%	11
Feihe (China)	73	18	56%	55
FrieslandCampina (China, Indonesia, Viet Nam)	80	52	79%	28
H&H (China)	42	35	89%	7
Hain Celestial (US)	0	0	N/A	0
HiPP (China, Germany, Viet Nam)	34	15	60%	19
Junlebao (China)	39	2	50%	37
Mead Johnson China (China)	92	10	10%	82
Morinaga Milk (Indonesia, Viet Nam)	100	91	79%	9
Nestlé (China, Germany, Indonesia, US, Viet Nam)	109	104	81%	5
Reckitt (Indonesia, US, Viet Nam)	91	60	82%	31
Vinamilk (Viet Nam)	25	15	100%	10
Yili (China)	23	17	71%	6
Total	980	657	69%	323

*Local company websites and social media platforms, as well as local parenting websites with company sponsored content

**Confirmed contractual relationships with five companies: *Abbott, Danone, FrieslandCampina, H&H, and Nestlé*

Online retail

In total, 323 point-of-sale promotions were observed on the websites of selected retailers across the five countries assessed. The most common forms of point-of-sale promotions found include discounts, giveaways, and offers. The highest number of point-of-sale promotions was observed in China, where 82 point-of-sale promotions were found for *Mead Johnson China*, 55 for *Feihe*, and 37 for *Junlebao* products. A relatively high number of point-of-sale promotions was also associated with *Reckitt*, *FrieslandCampina*, and *HiPP* products, with 31, 28, and 19 promotions respectively across China, Germany, Indonesia, and Viet Nam. Less than 15 point-of-sale promotions were found for *Beingmate* products in China (14) and for *Danone* products across China, Germany, Indonesia, and the US (11). In Viet Nam, 10 point-of-sale promotions were detected for BMS products sold by *Vinamilk*. For the rest of the companies assessed, less than 10 point-of-sale promotions were found across all markets.

Online media

In total, 657 online promotions were observed across the 16 companies assessed. These were detected on companies' websites and social media platforms, as well as parenting websites publishing content sponsored by companies. The findings were primarily advertisements of the companies' BMS brands or products.

Apart from advertising BMS, other common forms of online promotions identified include company provision of education and information about infant and young child nutrition and feeding, as well as solicited contact with

caregivers by asking them to sign-up to contests or baby clubs. These are all actions that do not comply with the Code.

The six companies with the highest amount of promotional content associated with their products are *Danone* (154), *Nestlé* (104), *Morinaga Milk* (91), *Abbott* (75), *Reckitt* (60), and *FrieslandCampina* (52). In China, the products found to be most promoted in online media were those sold by *H&H* (35), *Feihe* (18), and *Yili* (17). In Viet Nam, 15 promotions were noted for *Vinamilk* in Viet Nam, and an equal number was observed for *HiPP* across China, Germany, and Viet Nam. Lastly, products by *Mead Johnson China*, *A2 Milk*, and *Junlebao* were associated with 10, nine, and two promotional activities in online media, respectively. No online advertisements or promotions were found for *Beingmate* in China and *Hain Celestial* in the US.

also highlights the percentage of promotions found in online media that included one or more health, nutrition, or marketing claims.^f All promotions related to *Vinamilk* BMS products in Viet Nam contained at least one type of claim. A high proportion of promotional activities containing claims was also found in relation to products sold by *H&H* (89%), *Abbott* (88%), *Reckitt* (82%), *Nestlé* (81%), and *Morinaga Milk* and *FrieslandCampina* (79% each). The remaining companies range from approximately 70% of promotions containing claims for *Yili* and *A2 Milk* (71% and 67%, respectively) to around half for products sold by *HiPP* (60%), *Danone* and *Feihe* (56% each), and *Junlebao* (50%). Of the promotions related to *Mead Johnson China*, 10% of products contained claims.

Companies' findings from the online monitoring across the five countries are described in further detail on each company's scorecard (available [here](#)).

^f In this research, ATNI referred to WHO Europe's Nutrient and Promotion Profile Model for the definition of the different types of claims. Where local regulations require the inclusion of certain claims, these were not counted in this assessment.

The country reports (available [here](#)) also include additional details about the methods and the platforms monitored.

Traditional media monitoring results

Table 9 summarizes the promotional activities detected on traditional media.

Companies were found to engage in advertising across TV, radio, and print,⁹ with a total of 138 advertisements observed. Nearly all advertisements

(99%) included at least one type of claim. TV emerges as the dominant channel for traditional media advertising, with the majority of advertisements (124 out of 138) appearing on this platform. The highest number of promotional activities was recorded for *Danone* (54) and *Nestlé* (25). In China, *Yili* held the highest number of promotions among the companies assessed, totaling 16 advertisements distributed over TV and radio. Based on these findings, *Yili* was the only company which seemed to employ radio advertisements to reach consumers over the time frame of this research. Print advertising appeared to be less prevalent, with only a few instances

Table 9. Summary of traditional media advertisements (TV, radio, and print)

Companies	Total number of promotions identified	% of promotions that included claims	Traditional media		
			Number of TV ads	Number of radio ads	Number of print ads
A2 Milk (China)	0	0%	0	0	0
Abbott (Indonesia, US, Viet Nam)	8	100%	8	0	0
Beingmate (China)	0	N/A	0	0	0
Danone (China, Germany, Indonesia, US)	54	96%	53	0	1
Feihe (China)	0	N/A	0	0	0
FrieslandCampina (China, Indonesia, Viet Nam)	8	100%	7	0	1
H&H (China)	2	100%	2	0	0
Hain Celestial (US)	0	N/A	0	0	0
HiPP (China, Germany, Viet Nam)	1	100%	1	0	0
Junlebao (China)	5	100%	4	0	1
Mead Johnson China (China)	0	N/A	0	0	0
Morinaga Milk (Indonesia, Viet Nam)	9	100%	7	0	2
Nestlé (China, Germany, Indonesia, US, Viet Nam)	25	100%	23	0	2
Reckitt (Indonesia, US, Viet Nam)	9	100%	9	0	0
Vinamilk (Viet Nam)	1	100%	1	0	0
Yili (China)	16	100%	9	7	0
Total	138	99%	124	7	7

observed for Morinaga Milk and Nestlé (two each), as well as Danone, FrieslandCampina, and Junlebao (one each).

(available [here](#)). The country reports (available [here](#)) also include additional details about the methods and the platforms monitored.

Companies' findings from the traditional media monitoring across the five countries is described in further detail on each company's scorecard

Table 10. Summary of product labels incidences of non-compliance

Companies	Number of products assessed	Products for which clear images were not available	Number of product labels with one or more incidences of non-compliance	Average number of incidences of non-compliance per label	Most common non-compliances	
					% of labels that included claims	% of labels without a statement on the importance of breastfeeding
AA2 Milk (China)	2	2	2	3	100%	0%
Abbott (Indonesia, US, Viet Nam)	53	0	53	8	100%	97%
Beingmate (China)	24	0	24	4	0%	8%
Danone (China, Germany, Indonesia, US)	71	3	71	3	92%	79%
Feihe (China)	31	17	31	2	87%	39%
FrieslandCampina (China, Indonesia, Viet Nam)	17	0	17	4	94%	78%
H&H (China)	19	0	19	4	53%	100%
Hain Celestial (US)	5	2	5	10	100%	100%
HiPP (China, Germany, Viet Nam)	30	3	30	6	96%	75%
Junlebao (China)	46	27	43	2	61%	41%
Mead Johnson China (China)	10	6	10	4	90%	40%
Morinaga Milk (Indonesia, Viet Nam)	11	1	11	5	50%	50%
Nestlé (China, Germany, Indonesia, US, Viet Nam)	89	12	85	3	82%	76%
Reckitt (Indonesia, US, Viet Nam)	35	3	35	4	100%	83%
Vinamilk (Viet Nam)	18	10	18	5	100%	72%
Yili (China)	45	26	42	3	84%	42%
Total	506	112	496	4	85%	70%

Product label results

Table 10 illustrates the results of the product labels assessment carried out across the different companies and countries. Various incidences of non-compliance were identified on product labels, with the most common being the inclusion of claims and the absence of a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond, in line with WHO recommendations.

Of the 506 products evaluated in total, 496 were found to have at least one incidence of non-compliance with the Code. Only four products sold by *Nestlé* in Indonesia were found to be in full compliance with the Code. On the other hand, three products for *Junlebao* and *Yili* each did not have images that clearly showed all parts of the package, leaving the assessment of these products incomplete. As noted in the previous section on [Data verification](#), the two companies did not provide ATNI with additional information to complete the assessment of these six products, therefore it was not possible to determine whether they comply with the requirements of the Code. For other companies' products that were missing clear images, if at least one incidence of non-compliance was identified from the existing images, these labels were counted as a non-compliant observation.

The average number of observations of non-compliance per label was four, indicating that multiple incidences of non-compliance were often found on individual product labels. The highest average number of observations of non-compliance per label was detected for *Hain Celestial* (10), *Abbott* (eight), and *HiPP* (five), while the lowest was identified in products sold by *Junlebao* and *Feihe* in China (two observations of non-compliance per label on average, due to incomplete assessments).

Eighty-five percent of all product labels assessed across companies and countries included at least one type of claim. All labels of products sold by *A2 Milk* (China), *Abbott* (Indonesia, US, Viet Nam), *Hain Celestial* (US),

Reckitt (Indonesia, US, Viet Nam), and *Vinamilk* (Viet Nam) featured claims. On the other hand, *Beingmate* (China) was the only company to achieve a score of 0%, indicating that none of the 24 labels assessed on their products included no claims. For the rest of companies assessed, the percentage of labels including claims ranges from 50% (*Morinaga Milk*) to 96% (*HiPP*).

Moreover, 70% of all labels assessed did not feature a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond. *H&H* (China) and *Hain Celestial* (US) had the highest percentage of incidences of non-compliance in this respect, with none of their labels meeting this requirement. The lowest proportions of non-compliance in this category were observed for *A2 Milk* (0%) and *Beingmate* (8%) in China.

Companies' findings from the product label assessment across the five countries are described in further detail on each company's scorecard (available [here](#)) and in the country reports (available [here](#)).

5.8 Conclusions and recommendations on the BMS Country Studies

The findings of the in-country assessments carried out for the BMS Marketing Index 2024 highlight that compliance with the Code varies across companies and countries. However, none of the companies assessed achieved full compliance with the Code in any of the countries included in the study over the period between January 2023 and July 2023, with average country scores ranging from 0% to 66%.

A total of 657 promotions and 323 point-of-sale promotions were observed online, along with 138 advertisements detected on traditional media – showing companies are not complying with the Code, specifically with

Article 5 and Recommendations 4, 5, and 6 of the guidance supported by WHA 69.9. Online media emerged as the primary platform for promotions, while traditional media advertising was less prevalent, with TV being the dominant channel. These results suggest a potential shift towards digital and other media platforms for promotional efforts.

Nearly all product labels assessed (98%) were found to contain one or more incidences of non-compliance with the Code associated with Article 9 and Recommendation 4 of the guidance supported by WHA 69.9. The most common incidences of non-compliance found were the inclusion of claims and the absence of a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond. It is notable that four products by *Nestlé* – two IF and two FUF in Indonesia – were found to be in full compliance with the Code requirements on BMS product labeling. ATNI encourages *Nestlé* and other companies to follow this example of Code compliance for all types of BMS products, without exception, in all markets.

Most observed incidences of non-compliance concerned GUM (893 out of 1,612). Additionally, the different distribution of observations of non-compliance across channels depending on product types (mainly labeling for IF and FUF, and mostly online for GUM and brands associated with BMS products) suggests more stringent regulations limiting the advertising and promotion of IF and FUF through traditional and online media channels.

Based on the BMS country study results presented in this report, ATNI makes the following recommendations to BMS companies:

- Companies should prioritize efforts to enhance and harmonize compliance with the Code across all countries they operate in, ensuring consistently high levels of adherence to its recommendations.

- Companies should responsibly market their BMS products in digital environments, in line with the latest guidance by the WHO on restricting digital marketing of foods for infants and young children.
- Companies should ensure that contracted distributors abide by responsible marketing practices of their BMS products. Companies should also implement robust monitoring systems to ensure compliance, especially on online retailers.
- Companies should adopt Code-compliant policies and practices so their products are labeled according to the Code, including relevant elements of the guidance supported by WHA Resolution 69.9. These policies should also address the inclusion of nutritional, health, and marketing claims on BMS product labels.
- Companies should extend these policies and responsible marketing practices to apply to GUM, ensuring full alignment with the Code's recommendations.
- As several parallel imports were found in China, Indonesia, and Viet Nam, companies should ensure that only products intended for the dedicated market are sold in each country.
- Companies should promptly take corrective actions upon receiving reports of incidences of non-compliance with the Code.

5.9 Limitations of the BMS Country Studies

During this study, ATNI encountered several limitations that warrant acknowledgment. The expanded scope of the BMS Marketing Index 2024 warranted a modified approach to conducting assessments for the Country Studies, considering the resources available to ATNI. ATNI undertook an [extensive consultation process](#) in which these changes were discussed.

Despite the modifications, the methods are still guided by the NetCode protocol.

ATNI could not conduct on-the-ground data collection and instead relied on service providers, which led to discrepancies in data availability across different markets. Specifically, ATNI encountered more comprehensive product information, especially regarding labeling, in more developed markets, such as Germany and the US. However, this meant that ATNI's assessment may not have included an exhaustive list of products in other markets, like China, Indonesia, and Viet Nam. With regard to online monitoring, it is possible that some observations may not have been captured by the social listening method. Limitations may be attributed to the keywords used or website access restrictions, which was commonly encountered in monitoring social media platforms in China, and the online retailers across all five countries. Therefore, the channels monitored may not be representative of all local companies/brands, retailers, and parenting websites and social media platforms, as this also depends on the sources the social listening tool was able to collect data from in each of the five countries for each of the companies. In addition, the social listening tool was only able to capture newly published content during the research period. Therefore, it is possible that not all observations of non-compliance from the websites and social media platforms monitored were captured. Considering these limitations, the findings may not accurately reflect the actual level of compliance of the assessed companies.

Other limitations worth noting pertain to products that did not have images for every side of the package, or had blurry images, which limited the completion of the label assessments for these products and made it impossible to confirm if certain requirements were met or not. Furthermore, due to the intricacies and various forms of contractual relationships that can exist between the companies and online retailers or parenting websites, the extent to which these relationships could be confirmed was limited. ATNI had limited capacity and resources in this research to perform additional and thorough external validation checks.

Additional information on the limitations of the country studies is presented in more detail in the country reports, available [here](#).

6. Detailed results: BMS corporate profile

This section presents a summary of the Corporate Profile assessment conducted by ATNI for the BMS Marketing Index 2024. The purpose of this assessment is to determine the extent to which the 18 largest BMS companies' own global policies and their associated management systems are aligned with all provisions of the Code.

The companies are assessed on 11 topics addressing the different requirements of the Code. Most topics include assessments on both policy commitments and management systems (guidance and procedures provided by companies to their employees to ensure the implementation of the BMS commitments), except for the topic on 'implementation and monitoring', which mostly considers management systems, and the topic 'overarching commitments', which considers policy commitments only. A separate topic assesses the level of disclosure and transparency practiced by companies on the different aspects of the Code.

This assessment is conducted using publicly available information and – in some cases where companies chose to engage during the research – unpublished internal documentation which companies submit under a non-disclosure agreement to ATNI's online research platform.

Companies' findings from the Corporate Profile assessment is described in further detail on each company's scorecard (available [here](#)).

Companies' policies

As shown in **Table 11**, eight out of 18 companies had a BMS marketing policy. The policies were considered for the assessment if they were

available in the public domain or were shared by the company during the research period from February 2023 to May 2023. All companies' policies were publicly available except those from *Abbott* and *HiPP*. Further, *Abbott*, *Danone*, *Feihe*, *FrieslandCampina*, *Nestlé*, *Reckitt* and *Yili* were previously assessed in the BMS/CF Index 2021, and it was noted that *Abbott*, *FrieslandCampina*, and *Nestlé* have revised their policies since then. The nature of these revisions is described in the next sections, and in more detail in the companies' scorecards (available [here](#)).

Table 11. Policies relevant to BMS products considered for this assessment (if available) by company

Company	Policy* (up to 05/2023)
A2 Milk	N/A
Abbott*	Abbott Global Policy on the Marketing of Infant Formula (2023)**
Beingmate	N/A
Danone*	Danone Policy for the Marketing of Breast-Milk Substitutes (2018)
Feihe*	N/A
FrieslandCampina*	FrieslandCampina Corporate Policy for the Marketing of Infant Foods (2021)**
H&H	Responsible Marketing of Breast-Milk Substitutes Policy (2023)
Hain Celestial	N/A
Hero	N/A
HiPP	Guideline for marketing breast milk substitutes (2018)
Junlebao	N/A
Lactalis	N/A
Mead Johnson China	N/A
Morinaga Milk	Morinaga Milk Breast-Milk Substitutes (BMS) Marketing Policy (2021)
Nestlé*	Nestlé Policy for Implementing the WHO Code (2021)**
Reckitt*	Policy and Procedures on the Marketing of Breast-Milk Substitutes (2020)
Vinamilk	N/A
Yili*	N/A

Legend

- The company has a BMS marketing policy and it is publicly available
- The company has a BMS marketing policy but it is not publicly available
- No policy found in the public domain or shared by the company with ATNI

* Companies assessed in the BMS/CF Marketing Index 2021

** Updated BMS marketing policy since BMS/CF Marketing Index 2022

Companies' engagement

After ATNI researchers compile publicly available information (such as BMS marketing policies and company reports) to assess companies, companies are invited to review preliminary assessments and provide feedback and additional supporting material (first round of engagement). After the first round of engagement, ATNI carefully evaluates the comments and evidence (if provided) and adjusts the assessment, if applicable. Companies then get a second opportunity (second round of engagement) to review their assessment and/or answer clarification questions raised by ATNI analysts. ATNI then evaluates comments to finalize the assessment.

As seen in **Table 12**, around 40% of all companies engaged in both rounds (except *Morinaga Milk*, which engaged only in the first round), leading to an improved BMS Corporate Profile score after engagement. *Abbott*, *Danone*, *FrieslandCampina*, *H&H*, *Nestlé*, and *Reckitt* engaged extensively by providing supporting documents for several topics. *HiPP* and *Morinaga Milk* provided limited evidence. ATNI was unable to establish communication and actively engage with the other companies: *A2 Milk*, *Beingmate*, *Feihe*, *Hain Celestial*, *Hero*, *Junlebao*, *Lactalis*, *Mead Johnson China*, *Vinamilk*, and *Yili*. As a result, the assessments were based solely on information found in the public domain.

Table 12. ATNI BMS Index 2024, engagement during the research by company

Company	First round of engagement	Second round of engagement	Improved score after engagement
A2 Milk	Did not engage	Did not engage	N/A
Abbott	Yes	Yes	Yes
Beingmate	Did not engage	Did not engage	N/A
Danone	Yes	Yes	Yes
Feihe	Did not engage	Did not engage	N/A
FrieslandCampina	Yes	Yes	Yes
H&H	Yes	Yes	Yes
Hain Celestial	Did not engage	Did not engage	N/A
Hero	Did not engage	Did not engage	N/A
HiPP	Yes	Yes	Yes
Junlebao	Did not engage	Did not engage	N/A
Lactalis	Did not engage	Did not engage	N/A
Mead Johnson China	Did not engage	Did not engage	N/A
Morinaga Milk	Yes	No	Yes
Nestlé	Yes	Yes	Yes
Reckitt	Yes	Yes	Yes
Vinamilk	Did not engage	Did not engage	N/A
Yili	Did not engage	Did not engage	N/A

Are companies' policies aligned to the Code across topics?

As seen in **Table 13**, the average scores on the 11 topics ranged between 11% and 33% before the geographic penalty is applied. Companies showed fewer commitments regarding 'employee incentives' (11%), 'advertising and promotions' (13%), 'healthcare workers' (13%), and 'labeling' (13%). However, they performed relatively better on 'implementation and monitoring' (33%), followed by 'overarching commitments' (26%), 'lobbying and policy influence' (22%), and 'disclosure' (22%). The other topics' scores varied between 15% and 20% for 'healthcare systems', 'donations', and 'product quality'.

FrieslandCampina and *Danone* performed relatively well as they were found to have relevant commitments across all topics. Similar results were seen for *H&H*, *Nestlé*, and *Reckitt*, with relevant commitments found across all topics except one. It was observed that, for companies that did not engage and/or did not have a policy, the scores across all topics were lower compared to those that did engage and/or had a policy.

The following paragraphs present the overall results and give a detailed comparison of the companies' performance per topic, together with interesting examples.

Box 1: Changes in the BMS Index 2024 Corporate Profile methodology compared to the BMS/CF Index 2021


The methodology for this Index incorporates a new indicator in the 'overarching commitments' section to evaluate if companies apply their BMS marketing commitments to formulas for special medical purposes. This indicator holds significant weight, contributing 50% to the section's score. Additionally, changes involve removing a section on 'Information and Education' and adding one on 'Donations', with more indicators to better capture companies' commitments on this topic. A management systems indicator assessing the global application of commitments has been removed, with its intent integrated into other management systems indicators and covered by the application of the geographic penalty. Other minor adjustments include wording variations and modified answer options. For more details about these changes, please see the [Methodology](#) document (pages 12-13)

Table 13. Average score (before penalty) of companies' commitments per topic

	Over arching commitm ents	Advertisin g and Promotion s	Health care Systems	Donations	Health care workers	Employee Incentives	Labeling	Product Quality	Implemen tation and Monitorin g	Lobbying and Influence	Disclosur e	Average score per company
A2 Milk	3%										2%	0.5%
Abbott	46%	0%	20%	56%	17%	0%	0%	100%	75%	68%	14%	35.9%
Beingmate	9%								6%		2%	1.6%
Danone	47%	50%	40%	70%	50%	50%	40%	17%	99%	85%	67%	56.0%
Feihe	9%										2%	1.6%
Friesland Campina	97%	75%	60%	70%	42%	100%	75%	83%	100%	73%	86%	78.2%
H&H	97%	29%	50%	33%	25%	0%	38%	100%	93%	20%	63%	49.8%
Hain Celestial	3%								6%		5%	1.2%
Hero	3%										5%	0.7%
HiPP	25%	0%	0%	16%	0%	0%	7%	0%	15%	13%	7%	7.5%
Junlebao												0.0%
Lactalis									6%			0.5%
Mead Johnson China	16%										5%	1.8%
Morinaga Milk	28%	2%	0%	0%	8%	0%	0%	0%	6%	0%	12%	5.1%
Nestlé	47%	50%	60%	70%	42%	50%	40%	0%	92%	65%	77%	53.9%
Reckitt	44%	30%	40%	25%	42%	0%	25%	67%	83%	73%	55%	43.8%
Vinamilk									6%			0.5%
Yili												0.0%
Average section score	26%	13%	15%	19%	13%	11%	13%	20%	33%	22%	22%	19%
Highest score	97%	75%	60%	70%	50%	100%	75%	100%	100%	85%	86%	78%

Legend



 No score because no policy was found in the public domain or was shared by the company with ATNI

6.1.1 Overarching commitments

This topic consists of policy commitment indicators only.

To obtain a full score, the company should adhere to the Code to promote breastfeeding and appropriate use of breast-milk substitutes (BMS), if needed. As shown in **Table 13** the average score for this topic was 26%; four companies scored 0%, while *FrieslandCampina* and *H&H* scored 97% as they had the most commitments. These companies were the only ones showing that their BMS marketing commitments apply to formulas for special medical purposes (FSMPs). In addition, all companies – except *Lactalis*, *Junlebao*, *Yili*, and *Vinamilk* – stated the importance of exclusive breastfeeding for the first six months and continued breastfeeding for two years or more on their website and/or BMS marketing policy.

Interesting example: *H&H* was the only company found to acknowledge all subsequent relevant WHA resolutions that clarify and update the Code, including WHA 71.9, representing an example of good practice.

6.1.2 Advertising and promotions

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

To obtain a full score, the company should comply with the Code, specifically Article 5, and Recommendations 5 and 6 of the guidance supported by WHA Resolution 69.9. Companies should refrain from advertising BMS through various media channels and prohibit distribution of samples or promotional materials to pregnant women, mothers, or caregivers. Additionally, companies should avoid point-of-sale promotions and cross-promotion between different types of BMS, ensuring distinct packaging and labeling for each product category, and they should not educate caregivers on infant and young child feeding.

As seen in **Table 13** the average score for this topic was 13%, with the majority of companies (12) scoring 0%, while the rest scored between 29%

and 75%. *FrieslandCampina* showed the most commitments to this topic as it had commitments for all indicators assessed, except for not distributing articles or gifts that promote the use of BMS to caregivers and not directly nor indirectly providing education on infant and young child feeding to caregivers in any setting.

Additionally, only three companies (*Danone*, *FrieslandCampina*, and *Nestlé*) were found to have clear management systems in place. This means the companies could demonstrate providing, to a certain extent, clear instructions to staff and/or procedures to implement commitments related to advertising and promotion to the general public, as outlined in their BMS marketing policies. *FrieslandCampina* had the highest score (71%) as the company could demonstrate (under NDA) that it provides clear instructions to staff and procedures to implement all commitments that were found to be in line with the Code.

Interesting example: none of the companies except one (*FrieslandCampina*) included commitments related to cross-promotion of the different types of BMS products (including FSMPs) by ensuring different packaging designs and labels to distinguish the different products.

6.1.3 Healthcare systems

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

To obtain a full score, the company should adhere to the Code, specifically Article 6, and Recommendation 6 of the guidance supported by WHA Resolution 69.9. Companies should refrain from using healthcare facilities for promoting BMS products, displaying related materials, and providing gifts or coupons. They should also prohibit demonstrations of formula feeding by its staff and avoid hosting events or campaigns in health facilities.

As seen in **Table 13**, the average score for this topic was 15%; with the majority of companies (12) scoring 0%, while the rest scored between 20% and 60%. *FrieslandCampina* and *Nestlé* showed the most commitments for this topic (resulting in a 60% score each).

Only *FrieslandCampina* and *H&H* showed commitments indicating they would not use healthcare facilities to host events, contests, or campaigns. *Danone* and *H&H* were the only companies found to make an explicit statement not to give any gifts or coupons to caregivers. The scores for management systems were the lowest for this topic, with 14 companies scoring 0%, meaning they could not demonstrate they provide clear instructions to staff and/or procedures to implement commitments related to responsible marketing in healthcare systems. The rest of the companies were found to have evidence of management systems in place, resulting in scores of 20% and 60%.

Interesting example: *FrieslandCampina* was the only company found to mention in its policy (publicly disclosed) that it would not use healthcare facilities to host events and contests, and explicitly mentioned “for the display of covered products, placards or posters *concerning covered products or for the distribution to consumers of material related to covered products provided by FrieslandCampina or one of their distributors involved in the marketing of covered products, other than those specified*”. The company sets a good example by outlining the marketing materials it covers and mentioning that this commitment also extends to its distributors.

6.1.4 Donations

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

To obtain a full score, the company should cover commitments on donations in the healthcare system, in emergencies and humanitarian settings, and in social and welfare institutions, that are in line with the Code requirements specified in Recommendation 6 of the guidance supported by WHA Resolution 69.9, as well as WHA Resolutions 47.5 and 63.23, and the Operational Guidance for Infant and Young Child Feeding in Emergencies.

The company should comply with the Code recommendations by refraining from providing free or reduced-price BMS products (including equipment, materials, or services) through healthcare facilities. In humanitarian settings, BMS donations should be provided only upon official authoritative request, ensuring compliance with Code provisions and quality standards. In social welfare institutions, BMS products are only provided upon request, without using donations for sales inducement or distribution outside institutions.

As seen in **Table 13**, the average score for this topic was 19%; with the majority of companies (11) scoring 0%, while the rest scored between 16% and 70%. *Danone*, *FrieslandCampina*, and *Nestlé* showed evidence of most commitments assessed in this topic (70%). None of the companies showed commitments stating they would not donate or distribute any equipment, materials (including educational materials), or services to any part of the healthcare system.

Scores for management systems varied between 13% and 88%, with 12 companies lacking management systems (scoring 0%). *Danone*, *FrieslandCampina*, *Nestlé*, and *Abbott* provided evidence of procedures in place to implement their commitments that align with the provisions of the Code on BMS donations. However, fewer clear instructions to staff on implementing these commitments were found for the four companies, although some were found for *HiPP* and *Reckitt*.

Interesting example: *HiPP* was the only company found to explicitly commit to not distributing samples or dispensing free or reduced-price BMS products to caregivers via healthcare institutions or persons working in healthcare.

Interesting example: While *Nestlé* does not apply all Code provisions related to donations, the company showed evidence of detailed internal guidelines on donating BMS. It is also noted that *Nestlé's* donations policy partly covers FSMPs, despite those products not being covered by the company's BMS marketing policy.

6.1.5 Healthcare workers

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

To obtain a full score, companies should ensure only factual information is provided to health workers, that does not imply bottle-feeding superiority and is limited to providing guidance on the appropriate use of BMS, if needed. To avoid conflicts of interest, BMS companies should not sponsor scientific meetings for health professionals and any form of financial or material inducements (including gifts and incentives) to healthcare staff are prohibited. These requirements are in line with the Code, specifically Article 7 and Recommendation 6 of the guidance supported by WHA 69.9.

As seen in **Table 13**, the average score for this topic was 13%; with the majority of companies (11) scoring 0%, while the rest scored between 8% and 50%. *Danone* was found to have the most commitments on this topic (resulting in a 50% score), followed by *FrieslandCampina*, *Nestlé*, and *Reckitt* (42% each). None of the companies were found to have commitments that clearly state health workers would be provided with instructions about the appropriate preparation of powdered formulas according to specific guidelines set out in the Code. Also, none of the companies were found to commit to not sponsoring any scientific meetings, fellowships, study tours, and research grants for health professionals. None of the companies, except *H&H*, were found to explicitly state they would not offer any financial or material inducements (including gifts and incentives) to health workers or members of their families. Companies failed to meet this commitment because it was found that they provide gifts of low

⁸ While the Code's Article 8.1 explicitly refers to "the volume of sales of products within the scope of this Code", ATNI has clarified with WHO that this implicitly includes consideration of all forms of sales values, including measures of market share.

value in certain contexts – and, according to Code Article 7.3 and Resolutions WHA 49.15, WHA 58.32, and Recommendation 6 of WHA 69.9, financial or material inducement to health workers or members of their families are not allowed in any form.

Further, management systems scores varied between 17% and 33%, meaning that five of the companies could demonstrate they provide, to a certain extent, clear instructions to staff and/or procedures to implement commitments related to healthcare workers that are in line with the Code. The rest of the companies (13) lacked management systems in this aspect, scoring 0%.

Interesting example: *H&H* was the only company found to explicitly state that no inducements of any form would be provided to health workers or members of their families, representing a good practice example. Even though *H&H* was the only company to have this commitment, no management system was in place to ensure its effective implementation.

6.1.6 Employee incentives

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

To obtain a full score, companies should comply with Article 8 of the Code by excluding the sales volume⁸ of BMS products from sales-based incentives for employees or distribution partners involved in the marketing of these products.

As seen in **Table 13**, the average score for this topic was 11% – the lowest

score among all topics, because only three companies showed commitments related to incentives of employees involved in BMS marketing. *FrieslandCampina* achieved a full score as it was the only company found to explicitly state that marketing personnel would not receive bonuses based on the volume or value of sales for products covered by the company's BMS marketing policy, and that no quotas would be set for the sale of these products. Both *Danone* and *Nestlé* were found to only commit to the latter (50%).

Regarding management systems, *FrieslandCampina* had a full score, meaning the company could demonstrate providing clear instructions to staff on how to interpret and apply relevant commitments on bonus calculations and could demonstrate procedures to implement relevant provisions. *Danone* and *Nestlé* had as score of 50% showing clear instructions to staff but could not demonstrate procedures for all provisions related to bonus calculations in line with the Code.

Interesting example: *FrieslandCampina* presented as evidence multiple clear examples (under NDA) of instructions to staff on how to interpret and apply relevant commitments on bonus calculations. Examples shared included local training materials, with Do's and Don'ts for new employees and reminders to employees about non-compliant activities, amongst others.

6.1.7 Labeling

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

To obtain a full score, the company should ensure BMS containers have clear labels with information in the appropriate local language(s) and that they include appropriate breastfeeding messages. Labels should avoid idealizing formula use, and include ingredient information as well as warnings against the health hazards of inappropriate powdered formula preparation. Health or nutrition claims for BMS products should only be

included if required by national regulations. These requirements are in accordance with the Code, specifically Article 9 and Recommendation 4 of the guidance supported by WHA Resolution 69.9.

As seen in **Table 13**, the average score for this topic was 13%; with the majority of companies (12) scoring 0%, while the rest scored between 7% and 75%. *FrieslandCampina* was found to have most commitments on this topic (achieving a score of 75%), followed by *Danone* (44%), *Nestlé* (40%), *H&H* (38%), and *Reckitt* (25%).

None of the companies were found to commit to including all guidelines in line with the Code, specifically Article 9.4 and Recommendation 4 of the WHA 69.9 supported guidance, on its BMS products' labels or inserts. Companies did not have full commitments in this regard, as most were not found to indicate that labels of follow-up formula (FUF) and growing-up milks (GUM) should clearly state the products should not be introduced to infants under six and 12 months of age, respectively. Only *FrieslandCampina* was found to publicly and explicitly state that labels on all products covered by the company's BMS marketing policy will not contain any image, text, or representation that could imply usage for infants under six months of age. This commitment applies to all products intended for older infants and young children aged six to 36 months (FUF and GUM).

Further, management systems were found in place only for *Danone*, *FrieslandCampina*, and *Nestlé*, with scores between 25% and 63%. This means they showed, to a certain extent, clear instructions to staff and/or procedures to implement commitments related to labeling in line with the Code. The rest of the 15 companies lacked management systems in place, scoring 0%.

Interesting example: *FrieslandCampina* provided evidence of some procedures in place to implement commitments set out in its BMS marketing policy that relate to labeling, by outlining the steps involved in the approval process for labels, which involves various business units. This ensures that all relevant stakeholders contribute to the approval process,

thereby enhancing the robustness of the labeling standards. This represents a good practice example for procedures related to labeling standards.

6.1.8 Product quality

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

To obtain a full score, companies should adhere to Article 10 of the Code and explicitly state in product manuals which Codex Alimentarius Standards it follows for the production of BMS products, and ensure these are regularly revised with the most updated versions applicable.

As seen in **Table 13**, the average score for this topic was 20%; with the majority of companies (13) scoring 0%, while the rest scored between 17% and 100%. *Abbott* and *H&H* showed commitments on this topic in full (100%), indicating their products follow all relevant standards.

FrieslandCampina, *Reckitt*, and *Danone* showed less commitments (83%, 67%, and 17%, respectively). *Abbott*, *FrieslandCampina*, *H&H*, and *Reckitt* showed clear procedures to implement these commitments relating to BMS product quality and relevant Codex standards.

6.1.9 Implementation and monitoring

This topic consists of policy commitment indicators and management system indicators. The policy commitment indicators contribute to 20% of the topic score, while 80% of the score weighting is attributed to management system indicators.

To obtain a full score, companies should align with Article 11 of the Code, by taking responsibility for monitoring its marketing practices and ensuring compliance with the Code, national legislation, and its own BMS marketing policy. The company should also have transparent communication channels to encourage stakeholders to report observed incidences of non-

compliance, as well as a whistleblowing system in place for employees, and ensure prompt investigation and corrective action if needed.

As seen in **Table 13**, the average score for this topic was 33%, the highest average score among all topics. Almost all companies (13) had commitments related to the implementation and monitoring of BMS marketing policies, resulting in scores ranging from 6% to 100%. Ten out of 18 companies indicated using at least one of the specific food safety and quality management systems to certify their BMS products. However, only seven companies showed commitments for the other indicators.

FrieslandCampina showed evidence of all required commitments (100%), as it was the only company to show evidence of clear guidelines on the process for taking corrective action. *Danone* also showed evidence of a clear management system in place for all but one indicator resulting in a score of 99%.

The other companies scored between 7% and 89% in management systems as they did not provide evidence of comprehensive commitments nor provided sufficient evidence on procedures for responding to non-compliance incidents.

Interesting example: *FrieslandCampina* was the only company found to show evidence of clear guidelines on the process for taking corrective action in the event an observed incident of non-compliance with its BMS marketing policy is confirmed and had guidelines for employees and all relevant third parties on potential corrective actions that should be taken.

6.1.10 Lobbying and policy influence

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

To obtain a full score, companies should have a policy setting out under what circumstances and how it will lobby and engage with governments and policy makers on issues relating to the Code and BMS marketing. Companies should also commit to not undermining existing public policy frameworks, the work of WHO or similar agencies, and government efforts to develop regulations to implement the Code in full, and thus should refrain from objecting to the enactment, monitoring, or enforcement of any Code-aligned provisions. Further, they should periodically review trade association memberships and the extent to which associations' positions align with their own, and put in place controls over all lobbyists to ensure they understand and adhere to organizational policies. Additionally, companies should have clear accountability and responsibility procedures, including assigning to the Board oversight of its lobbying policy commitments, lobbying positions, and activities. The company is also expected to designate implementation and regular follow-ups to a specific Executive function.

As seen in **Table 13**, the average score for this topic was 22%; with the majority of companies (11) scoring 0%, while the other companies scored between 13% and 85%. *Danone* showed evidence of the most commitments on this topic (achieving a score of 85%), as it was the only company that had a clear description of its lobbying-related management system. *H&H* did not show comprehensive commitments on this topic, but was the only company that showed a commitment not to undermine and support existing public policy frameworks, the work of WHO or similar agencies, and government efforts to develop regulations to implement the Code.

Interesting example: *Danone* was noted for good practice because, based on *Danone's Policy on Advocacy (2023)*, the company shows extensive evidence that the Board has oversight of its lobbying policy, positions, and activities. Further, the company names an executive/function with the responsibility of implementing this policy. The company also provides clarity on control mechanisms (e.g. reporting to the Board, internal audits).

6.1.11 Disclosure

This topic consists of disclosure indicators only.

To obtain a full score, companies should publicly disclose all commitments related to the Code. The average score for this topic was 22%. All companies, except *Junlebao*, *Lactalis*, *Yili*, and *Vinamilk*, had at least one BMS commitment publicly disclosed. As seen in **Table 13**, 12 out of 18 companies publicly disclosed their support for breastfeeding. Half of the companies publicly disclosed, to some extent, a list of trade associations and industry groups the company is a member of, relating to BMS. *FrieslandCampina* had the most commitments publicly disclosed (86%).

Interesting example: *Danone* was noted for good practice, because based on *Danone's Policy on Advocacy (2023)* the company shows extensive evidence that the board has oversight of its lobbying policy and lobbying positions and activities. Further, the company names an executive/function with the responsibility of implementing this policy. The company also provides clarity on control mechanisms (e.g. reporting to the Board, internal audits).

Geographic penalty and final scores

Box 2: BMS product type weighting and geographic penalties

The final score is calculated from the initial score, which is assessed based on companies' BMS marketing commitments across 11 topics that cover different aspects of the Code. To fully comply with the Code, companies should apply their BMS marketing commitments to all types of BMS products. Weightings are assigned to each product category, noting that IF carries the largest weight (45%), followed by FUF (35%) and GUM (20%). An additional requirement to fully comply with the Code is that companies uphold (i.e. apply without restrictions) these commitments for each product type in all the markets where they sell their BMS products, otherwise a geographic penalty ranging from 0% to 90% is applied (see [Methodology](#) pages 16-17). Euromonitor retail sales estimates (2021 data) were used to calculate the proportion of companies' global product sales covered per product type. It is important to note however that the underlying data used for the calculations may not be fully representative of the company's markets.

Figure 2 shows the percentage of global BMS product sales⁹ where commitments are upheld, based on which a geographic penalty is applied to each type of BMS. The penalty ranges from 0% up to 90%, depending on

⁹ Retail sales estimates were derived from the data available on the Euromonitor database "Passport" for these product categories based on Euromonitor proprietary taxonomy and definitions for infant formula, follow-up formula, growing-up milks and formulas for special medical purposes, which closely align with ATNI's definitions.

whether a company fully upholds its BMS marketing commitments in all or none of the countries in which it operates, where national Code regulations are absent or less stringent than the company's policies and standards (additional details on how the geographic penalty was applied to each company by product type are described in the company-specific scorecards, available [here](#)). For most companies, either no BMS marketing policy or relevant commitments were found or shared by the company to determine if and how these are upheld for different BMS products across all markets. For companies that had a BMS policy, infant formula (IF), intended for infants from birth, was the type of product covered by most companies in most markets. *Abbott, Danone, FrieslandCampina, H&H, HiPP, and Nestlé* were found to uphold their commitments for IF products globally. However, while the other companies exempted some types of IF, mainly FSMPs,¹⁰ only *FrieslandCampina* and *H&H* were found to uphold their BMS marketing policies to all types of IF without exception. *Morinaga Milk* and *Reckitt* were also found to uphold their BMS marketing commitments to IF, but only to some types of IF and only in some markets where they sell these products.

Of the eight companies with BMS marketing policies, six only uphold their policy to some types of FUF products, intended for older infants from six months of age, and only in some markets where they sell these products. Apart from *FrieslandCampina*, the other five companies only uphold their BMS marketing commitments for FUF (excluding FSMPs) in 'higher-risk' countries, defined by FTSE4Good as countries that meet either of the following criteria: a) more than 10 per 1000 under-five mortality rate, or b) more than 2% acute malnutrition (moderate and severe wasting) in children under five. Therefore, as shown in **Figure 2**, these markets represent almost

¹⁰ FSMPs are products formulated for infants and young children with specific conditions, and entail formulas such as soy formula, lactose-free formula, low-birthweight/premature formula, and therapeutic milks.

70% of the companies' global FUF sales¹¹ (excluding FSMP sales) for *Danone*, *Morinaga Milk*, and *Nestlé*, and only around 30% for *Abbott* and *Reckitt* (27%) – corresponding to higher geographic penalties applied for these two companies. According to *FrieslandCampina's* BMS marketing policy, commitments are upheld for FUF where these products are covered by local Code regulations, representing almost 96% of the company's global FUF sales. *H&H* was the only company found to uphold its commitments for all its FUF globally, whereas *HiPP* was found to be the only company with a BMS marketing policy that did not cover any FUF.

For GUM, intended for young children between one and three years of age, only *FrieslandCampina* was found to uphold its BMS marketing commitments to this product type where these products are covered by local Code regulations that are less strict than the company's global commitments; representing around 5% of the company's global GUM sales.¹²

¹¹ Euromonitor International Limited, Dairy Products and Alternatives Edition, 2021 data, © All rights reserved

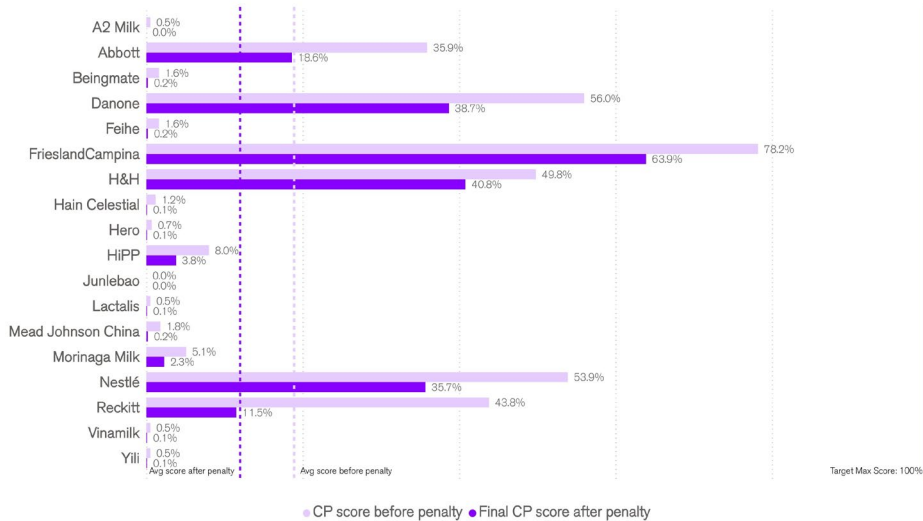
¹² Euromonitor International Limited, Dairy Products and Alternatives Edition, 2021 data, © All rights reserved

Figure 2. Percentage of companies' global sales where BMS marketing commitments are upheld



Figure 3 shows the companies' Corporate Profile score before and after the geographic penalty is applied. Companies initially scored an average of 19% but, after application of the geographic penalty (based on penalties calculated from), the average final score was 12%. The final Corporate Profile score considers how the company's BMS marketing commitments are applied to the different BMS product types sold by the company, and across different markets. *FrieslandCampina* shows the highest final score (64%), reflecting the commitments around the different provisions of the Code where the commitments are upheld for different product categories and across the markets it operates in, followed by *H&H* (41%) and *Danone* (39%). Some companies had a score of 0% after penalties were applied (*A2 Milk* and *Junlebao*), and eight other companies scored after penalties between 0 to 1% (*Beingmate*, *Feihe*, *Hain Celestial*, *Hero*, *Lactalis*, *Mead Johnson China*, *Vinamilk*, and *Yili*).

Figure 3. Companies' BMS Corporate Profile scores before and after the geographic penalty is applied*



*Weightings per type of BMS products – IF (45%), FUF (35%), and GUM (20%) – are already applied in the final score

6.2 Conclusions and recommendations on the BMS Corporate Profile

None of the 18 companies were found to have a comprehensive BMS marketing policy that incorporates **all** commitments from the Code, i.e, the 1981 Code and all subsequent relevant WHA resolutions and related guidance and standards, up to and including WHA Resolution 71.9. Eight out of the 18 companies had a BMS marketing policy, which is available in the public domain (except for *Abbott* and *HiPP*). Of the seven companies that were previously assessed in the BMS/CF Marketing Index 2021, it was noted that *Abbott*, *FrieslandCampina*, and *Nestlé* have revised their policies since the last assessment. Both *FrieslandCampina* and *Nestlé* have improved the scope and application of their BMS marketing policies, taking closer steps towards achieving full Code compliance. Compared to the BMS/CF Index 2021 assessment, *FrieslandCampina* has improved the application of its BMS marketing policy to cover IF in all markets without exception. The company also now upholds its commitments to the marketing of formula for children aged 6-36 months where these products are covered by local regulations that are less strict than the company's global commitments. *Nestlé*, on the other hand, has expanded the scope of its BMS marketing policy to cover IF for infants aged 0-6 months (excluding FSMPs) in all markets without exception and continues to cover FUF for older infants aged 6-12 months only in some markets.

Approximately 40% of the companies engaged in both rounds by providing additional documents, leading to an improved Corporate Profile score after engagement. The rest of the companies had to be assessed solely on limited publicly available information. For companies that did not engage and/or did not have a policy, the scores across all topics were lower

compared to those that engaged and/or had a policy. The companies' scores across the 11 topics ranged from 11% to 33%. Companies had the least commitments aligned with the Code on BMS promotion to the public, to health workers, and on appropriate labeling of these products.

FrieslandCampina and *Danone* showed more commitments across the 11 topics compared to the other companies. Although a number of companies were found to be relatively well-aligned with the provisions of the original Code of 1981, none of the companies were found to have fully incorporated the recommendations of the guidance supported by WHA Resolution 69.9 on ending the inappropriate promotion of foods for infants and young children.

The eight companies that had a BMS marketing policy were found to variably uphold their commitments for some BMS product categories and across different markets. All eight companies upheld their commitments to marketing IF to some extent; however, only *FrieslandCampina* and *H&H* were found to do so for all types of IF – without exception – and in all markets. FUF was covered by the eight companies only in some markets and mostly excluding FSMPs. While *HiPP* was not found to uphold its policy to marketing FUF, *H&H* was the only company found to fully do so in all markets it sells the product. None of the companies' BMS marketing policies were found to cover GUM, except for *FrieslandCampina*, which was found to uphold its commitments to responsibly market these products in countries where they are covered by local regulations that are less strict than the company's global commitments. As most companies were found to uphold their BMS marketing policies for IF in more markets, thus representing a higher proportion of their global IF sales, the geographic penalties applied for upholding commitments to this product type were lower compared to those applied for FUF and GUM.

The average Corporate Profile score was 19%, dropping to 12% after the geographic penalty was applied to each product type. *FrieslandCampina* had the highest final score (64%), followed by *H&H* (41%) and *Danone* (39%). Some companies had a score of 0% after penalties were applied and eight

other companies scored less than 1%. It is worth noting that, in the case of limited or no engagement by companies, the results of this assessment may not represent the full extent of their policies and practices.

6.2.1 Recommendations for the companies

The aim of ATNI's assessments is to incentivize company action towards full Code compliance in policy and practice, acknowledging that this is a step-wise process. ATNI urges companies to uphold their BMS marketing commitments for all BMS products (including FSMPs) globally. As seen in **Table 14**, the 10 companies for which no BMS marketing policy was found or shared are encouraged to develop and/or publish a policy dedicated to the responsible marketing of BMS. ATNI acknowledges and welcomes the positive steps taken by *FrieslandCampina* and *Nestlé* since the last assessment for the BMS/CF Marketing Index 2021, and encourages all companies to take the necessary steps towards full Code compliance in policy and practice. Companies' commitments should apply to all product types (IF, FUF, and GUM, including FSMPs) in all markets.

In addition to improving the scope and application of their BMS marketing policies, companies must fully align their policies with the Code and all subsequent relevant WHA resolutions. Based on the findings of this assessment, ATNI calls on companies to follow the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA Resolution 69.9, to strengthen responsible BMS marketing practices.

Companies should bolster their management systems to deliver consistent compliance with their stated commitments, once brought into full alignment with the Code. Specifically, companies are encouraged to put in place a full suite of procedures and instructions to staff in relation to each provision and recommendation of the Code. Companies are also recommended to adopt

effective company-wide governance, auditing, and management arrangements to ensure the policy and systems work effectively. They should also publish more information on their BMS marketing policies and practices to increase transparency, and make key documents easily accessible to stakeholders.

Table 14. Step-wise approach to reach full Code compliance

Companies	Does the company have a BMS marketing policy?	Infant formula		Follow-up formula		Growing-up milk		Upheld for IF, FUF, and GUM (including FSMPs) globally
		Upheld for IF in some markets and/or excluding FSMPs	Upheld for all IF globally (including FSMPs)	Upheld for FUF in some markets and/or excluding FSMPs	All FUF globally (including FSMPs)	Upheld for GUM in some markets and/or excluding FSMPs	Upheld for GUM globally (including FSMPs)	
A2 Milk	No information							
Abbott	X	X		X				
Beingmate	No information							
Danone	X	X		X				
Feihe	No information							
Friesland Campina	X		X	X		X		
H&H	X		X		X			
Hain Celestial	No information							
Hero	No information							
HiPP	X	X						
Junlebao	No information							
Lactalis	No information							
Mead Johnson China	No information							
Morinaga Milk	X	X		X				
Nestlé	X	X		X				
Reckitt	X	X		X				
Vinamilk	No information							
Yili	No information							

7. Conclusions and recommendations

ATNI's assessment of companies' global BMS policies and marketing practices in five countries showed that none of the 18 companies assessed in the BMS Marketing Index 2024 fully comply with the Code.

Seven of the 18 companies were previously assessed in the BMS/CF Index 2021: *Abbott, Danone, Feihe, FrieslandCampina, Nestlé, Reckitt, and Yili*.

ATNI acknowledges and welcomes the improved geographic scope of *FrieslandCampina* and *Nestlé's* revised BMS marketing policies, taking closer steps towards achieving full Code compliance. ATNI encourages all companies to take the necessary steps towards full Code compliance in policy and practice.

Of these seven previously assessed companies, some improvements were also identified in company practices compared to the BMS/CF Index 2021. For example, most of the companies were found to have clearer instructions on the appropriate preparation of formula, when needed. However, all seven companies continue to have low compliance with the Code in the different markets assessed.

Similar to the BMS/CF Marketing Index 2021, ATNI found that none of the seven companies had fully incorporated the recommendations of the guidance on ending the inappropriate promotion of foods for infants and young children, supported by WHA Resolution 69.9, in policy or practice. According to this guidance, the Code applies to BMS products intended for children up to three years of age, yet none of the companies were found to extend the scope of their BMS marketing policy to growing-up milks (GUM). *FrieslandCampina*, however, was found to uphold its BMS policy in

marketing GUM where these products are covered by local Code regulations that are less strict than the company's global commitments. ATNI did not find commitments from the companies in accordance with the Code, specifically pertaining to the WHA 69.9 supported guidance, such as ensuring the inclusion of messages that state the importance of continued breastfeeding for up to two years or beyond, refraining from educating caregivers on infant and young child feeding, or from sponsoring healthcare workers to avoid conflicts of interest. These identified gaps in the companies' policies were also reflected in the companies' marketing practices in the country studies. In addition, the findings of the country studies showed that most incidences of Code non-compliance concerned GUM.

The results from the Country Studies of the BMS Marketing Index 2024 also show that companies continue to rampantly promote BMS products on digital platforms. However, a relatively lower number of promotions were found both online and on traditional media for infant formula (IF) and follow-up formula (FUF) products, being products broadly covered by the companies' BMS marketing policies as well as local Code regulations. This demonstrates the effectiveness of Code-aligned regulations, but also shows that companies can market more responsibly if their BMS policies align more closely with the Code and effective management systems are set to implement those policies.

No BMS marketing policy was found for *Feihe* and *Yili* in this iteration either, nor shared with ATNI by the companies. However, the companies' marketing practices were assessed for the first time in China, as part of the Country Studies for the BMS Marketing Index 2024. As for the 11 newly assessed companies in the BMS Marketing Index 2024, no BMS marketing policy was found for, nor shared with ATNI, for eight of the 11 companies. Meanwhile, two companies (*Hero* and *Lactalis*) were not assessed on their marketing practices as they do not sell BMS products in any of the five countries selected for this iteration.

The BMS Marketing Index 2024 presents the first comprehensive assessment of the BMS marketing policies of *H&H*, *HiPP*, and *Morinaga Milk*. Both *H&H* and *Morinaga Milk* cover IF and FUF. However, based on *H&H*'s BMS marketing policy – which was found to be relatively well-aligned with the provisions of the Code – the company upholds its commitments for these products globally, while *Morinaga Milk*'s policy showed that commitments are only upheld in some markets. According to *HiPP*'s BMS

marketing policy, the company upholds commitments in marketing IF globally; however, ATNI could not confirm if the policy also applied to formulas for special medical purposes (FSMPs). ATNI hopes that the assessments conducted help the companies understand areas in which they can improve to strengthen their marketing practices in line with the Code.

Recommendations

Recommendations to BMS companies:

- Companies should prioritize efforts to enhance and harmonize compliance with the Code across all countries they operate in, to protect optimal nutrition for infants and young children globally.
- Companies must fully align their policies and practices with the Code, including all subsequent relevant WHA resolutions up to WHA Resolution 71.9. Companies are especially urged to follow the guidance on ending the inappropriate promotion of foods for infants and young children, supported by WHA Resolution 69.9, to strengthen responsible BMS marketing practices in line with the Code. For example, companies should not provide education and information about infant and young child feeding to caregivers, nor solicit contact with them through sign-ups to contests or baby clubs, and they should avoid cross-promoting the different BMS product types.

- Based on ATNI's findings, companies are encouraged to have explicit commitments and guidelines on responsibly marketing their BMS products in digital environments, in line with the latest guidance by WHO on restricting digital marketing of foods for infants and young children.
- Based on the results of the country studies, companies are urged to strengthen their policies and practices to address the inclusion of nutritional, health, and marketing claims on product labels in line with the Code.
- ATNI urges companies to uphold their BMS marketing commitments for all BMS products (including FSMPs) globally, and extend responsible marketing practices to GUMs, which constitute around 40% of global BMS sales.
- Companies that do not yet have a dedicated BMS marketing policy should develop and/or publish such policies that fully align with the Code. All companies are encouraged to refer to [ATNI's model company BMS marketing policy](#) to see how they can comply with the Code in policy and practice.
- Companies should bolster their management systems to deliver consistent compliance with their stated commitments, once brought into full alignment with the Code.
- Companies should promptly take corrective actions upon receiving reports of incidences of non-compliance with the Code.
- ATNI urges companies selling products within the scope of the Code to take responsibility for monitoring their marketing practices beyond local regulations, according to the principles and the aim of the Code and subsequent relevant resolutions.

- Companies should publish more information on their BMS marketing policies and practices to increase transparency, and make key documents easily accessible to stakeholders.

- Investors are urged to employ their influence to encourage companies to take steps towards full Code compliance.

Recommendations to investors

As shareholders, investors play a significant role in shaping food companies' governance, strategy, and disclosure practices.

- Investors should make use of existing models, such as [ATNI's model company BMS marketing policy](#), to integrate Code compliance into responsible investment strategies.
- Investors can use the findings of this Index to drive companies' progress on responsible BMS marketing practices through various investment strategies, calling for transparency and compliance to the Code.
- Investors can use the data from this report to develop materials to support engagement with companies.
- We suggest that particular focus be placed on restricting parallel imports to countries and recommend the consideration of stricter rules to prevent the entry and marketing of parallel import products that do not comply with national regulations. The authorities could, perhaps, look at how the importation of these products might be more strictly controlled.
- The scope of national legislation should be expanded to encompass formulas intended for older infants and young children up to 36 months of age.

Recommendations to policy makers

- Regulatory authorities should align local regulations more closely with the provisions of the Code, to address existing gaps and strengthen enforcement mechanisms.
- Digital marketing is challenging the ways in which national legislation is enforced and monitored. There is an urgent need to enforce regulations on digital marketing and introduce stronger legislation to monitor responsible BMS sale strategies. Ministries of information and communications and ministries of health should test new artificial intelligence applications for tracking Code violations online (e.g. such as VIVID, short for Virtual Violations Detector)

Recommendations to civil society and non-governmental organizations (NGOs)

- Educational campaigns targeting consumers should be conducted to raise awareness on the importance of breastfeeding and the potential risks associated with inappropriate marketing of BMS products.
- NGOs, professional groups, institutions, and individuals can contribute by proactively reporting incidences of non-compliance with the Code to companies or distributors through available channels.
- NGOs, civil society, and academia can contribute to addressing current public health concerns by developing tools and means that support overall Code monitoring, enforcement, research, and adoption.

Recommendations to third-party monitoring groups

- Third-parties can make use of ATNI's comprehensive BMS marketing assessments to monitor companies' progress in achieving Code compliance, including initiatives such as the [BMS Call to Action](#), and [B Lab's certification criteria for BMS companies](#).

8. References

¹ "The Cost of Not Breastfeeding," <https://www.aliveandthrive.org/en/the-cost-of-not-breastfeeding> (Accessed: 9 February 9 2024)

² Likhar, A. and Patil, M.S. (2022) 'Importance of Maternal Nutrition in the First 1,000 Days of Life and Its Effects on Child Development: A Narrative Review,' *Cureus* 14, no. 10: e30083, <https://doi.org/10.7759/cureus.30083> (Accessed: 31 January 2024).

³ World Health Organization (2013) *Essential Nutrition Actions: Improving Maternal, Newborn, Infant and Young Child Health and Nutrition*. Geneva: World Health Organization. Available at: <https://iris.who.int/handle/10665/84409> (Accessed: 31 January 2024).

⁴ Verduci, E. et al. (2021) 'The Triad Mother-Breast Milk-Infant as Predictor of Future Health: A Narrative Review,' *Nutrients* 13, no. 2 (February 2, 2021): 486, <https://doi.org/10.3390/nu13020486> (Accessed: 31 January 2024).

⁵ World Health Organization (2023) 'Infant and Young Child Feeding,' December 20, 2023. Available at: <https://www.who.int/news-room/fact-sheets/detail/infant-and-young-child-feeding> (Accessed: 31 January 2024).

⁶ Chowdhury, R. et al. (2015) 'Breastfeeding and Maternal Health Outcomes: A Systematic Review and Meta-Analysis,' *Acta Paediatrica* 104, no. S467: 96–113, <https://doi.org/10.1111/apa.13102> (Accessed: 31 January 2024).

⁷ Sankar, M.J. et al. (2015) 'Optimal Breastfeeding Practices and Infant and Child Mortality: A Systematic Review and Meta-Analysis,' *Acta Paediatrica* 104, no. S467: 3–13, <https://doi.org/10.1111/apa.13147> (Accessed: 31 January 2024).

⁸ World Health Organization (2023) 'Infant and Young Child Feeding,' December 20. Available at <https://www.who.int/news-room/fact-sheets/detail/infant-and-young-child-feeding> (Accessed: 31 January 2024).

⁹ Pérez-Escamilla, R., et al. (2023) 'Breastfeeding: Crucially Important, but Increasingly Challenged in a Market-Driven World,' *The Lancet* 401, no. 10375: 472–85, [https://doi.org/10.1016/S0140-6736\(22\)01932-8](https://doi.org/10.1016/S0140-6736(22)01932-8) (Accessed: 31 January 2024).

¹⁰ Arts, M., Mehra, V. and Hayashi, C. (2018) *Breastfeeding. A Mother's Gift for Every Child*. New York: United Nations Children's Fund. Available at: https://www.unicef.org/media/48046/file/UNICEF_Breastfeeding_A_Mothers_Gift_for_Every_Child.pdf (Accessed: 31 January 2024).

¹¹ Ibid.

¹² United Nations Children's Fund (UNICEF), World Health Organization (WHO) and Global Breastfeeding Collective (2022) *Global Breastfeeding Scorecard 2022: Protecting Breastfeeding through Further Investments and Policy Actions*. Available at: <https://www.globalbreastfeedingcollective.org/media/1921/file#:~:text=BREASTFEEDING%20RATES,-Globally%2C%20the%20rates&text=The%20global%20target%20for%202030,80%25%20and%2060%25%20respectively> (Accessed: 31 January 2024).

¹³ Global Breastfeeding Collective, World Health Organization (WHO) and United Nations Children's Fund (UNICEF) (2018) *Breastfeeding in Emergency Situations*. Available at: <https://www.globalbreastfeedingcollective.org/media/376/file/Breastfeeding%20in%20Emergency%20situations.pdf> (Accessed: 31 January 2024).

¹⁴ Global Breastfeeding Collective, World Health Organization (WHO) and United Nations Children's Fund (UNICEF) (2023) *Global Breastfeeding Scorecard 2023. Rates of Breastfeeding Increase around the World through Improved Protection and Support*. Available at: <https://www.who.int/publications/i/item/WHO-HEP-NFS-23.17#:~:text=The%202023%20Scorecard%20highlights%20countries,in%20a%20separate%20methodology%20document> (Accessed: 31 January 2024).

¹⁵ Global Breastfeeding Collective, World Health Organization (WHO) and United Nations Children's Fund (UNICEF) (2018) *Breastfeeding in Emergency Situations*. Available at: <https://www.globalbreastfeedingcollective.org/media/376/file/Breastfeeding%20in%20Emergency%20situations.pdf> (Accessed: 31 January 2024).

¹⁶ Victora, C.G. et al. (2016) 'Breastfeeding in the 21st Century: Epidemiology, Mechanisms, and Lifelong Effect,' *The Lancet* 387, no. 10017: 475–90, [https://doi.org/10.1016/S0140-6736\(15\)01024-7](https://doi.org/10.1016/S0140-6736(15)01024-7) (Accessed: 31 January 2024).

¹⁷ Neves, P.A.R. et al. (2021) 'Rates and Time Trends in the Consumption of Breastmilk, Formula, and Animal Milk by Children Younger than 2 Years from 2000 to 2019: Analysis of 113 Countries,' *The Lancet Child & Adolescent Health* 5, no. 9: 619–30, [https://doi.org/10.1016/S2352-4642\(21\)00163-2](https://doi.org/10.1016/S2352-4642(21)00163-2) (Accessed: 31 January 2024).

¹⁸ Ahsan, S., Jain, S. and Walters D. (2022) The Global Cost of Not Breastfeeding. Nutrition International and Alive&Thrive. Available at: <https://www.nutritionintl.org/wp-content/uploads/2022/07/CONBF-Global-Brief-ENG-2023-10-31.pdf> (Accessed: 5 February 2024).

¹⁹ United Nations Children's Fund (UNICEF), Association of Southeast Asian Networks (ASEAN) and World Food Programme (WFP) (2022) ASEAN Food and Nutrition Security Report 2021. Available at: <https://www.unicef.org/eap/media/10691/file/%20ASEAN%20Food%20and%20Nutrition%20Security%20Report%202021.pdf> (Accessed 9 February 2024).

²⁰ World Health Organization (n.d.) 'Global Targets 2025'. Available at: <https://www.who.int/teams/nutrition-and-food-safety/global-targets-2025> (Accessed 2 February 2024).

²¹ Arora, A. (2019) WHO/UNICEF Discussion Paper: The Extension of the 2025 Maternal, Infant and Young Child Nutrition Targets to 2030. Available at: <https://data.unicef.org/resources/who-unicef-discussion-paper-nutrition-targets/> (Accessed: 31 January 2024).

²² United Nations Children's Fund (2023) 'Infant and Young Child Feeding (IYCF) Data,' UNICEF DATA. Available at: <https://data.unicef.org/resources/dataset/infant-young-child-feeding/> (Accessed: 9 February 2024).

²³ Pérez-Escamilla, R., et al. (2023) 'Breastfeeding: Crucially Important, but Increasingly Challenged in a Market-Driven World,' *The Lancet* 401, no. 10375: 472–85, [https://doi.org/10.1016/S0140-6736\(22\)01932-8](https://doi.org/10.1016/S0140-6736(22)01932-8) (Accessed: 31 January 2024).

²⁴ Ibid.

²⁵ Rafael Pérez-Escamilla et al. "Breastfeeding: Crucially Important, but Increasingly Challenged in a Market-Driven World," *The Lancet* 401, no. 10375 (February 2023): 472–85. [https://doi.org/10.1016/S0140-6736\(22\)01932-8](https://doi.org/10.1016/S0140-6736(22)01932-8).

²⁶ Euromonitor International (2022) Euromonitor International. Available at: <https://www.portal.euromonitor.com/magazine/u.s.main/> (Accessed: 31 January 2024).

²⁷ Victora, C.G. et al. (2016) 'Breastfeeding in the 21st Century: Epidemiology, Mechanisms, and Lifelong Effect,' *The Lancet* 387, no. 10017: 475–90, [https://doi.org/10.1016/S0140-6736\(15\)01024-7](https://doi.org/10.1016/S0140-6736(15)01024-7) (Accessed: 31 January 2024).

²⁸ Ibid.

²⁹ Segura-Pérez, S. et al. (2022) 'Risk Factors for Self-Reported Insufficient Milk during the First 6 Months of Life: A Systematic Review,' *Maternal & Child Nutrition* 18, no. S3: e13353, <https://doi.org/10.1111/mcn.13353> (Accessed: 31 January 2024).

³⁰ Pérez-Escamilla, R., et al. (2023) 'Breastfeeding: Crucially Important, but Increasingly Challenged in a Market-Driven World,' *The Lancet* 401, no. 10375: 472–85, [https://doi.org/10.1016/S0140-6736\(22\)01932-8](https://doi.org/10.1016/S0140-6736(22)01932-8) (Accessed: 31 January 2024).

³¹ Centers for Disease Control and Prevention (2023) 'Facts About Nationwide Breastfeeding Goals,' Centers for Disease Control and Prevention, August 7, <https://www.cdc.gov/breastfeeding/data/facts.html> (Accessed: 31 January 2024).

³² Pérez-Escamilla, R., et al. (2023) 'Breastfeeding: Crucially Important, but Increasingly Challenged in a Market-Driven World,' *The Lancet* 401, no. 10375: 472–85, [https://doi.org/10.1016/S0140-6736\(22\)01932-8](https://doi.org/10.1016/S0140-6736(22)01932-8) (Accessed: 31 January 2024).

³³ Pérez-Escamilla et al.

³⁴ World Health Organization (2022) Scope and Impact of Digital Marketing Strategies for Promoting Breastmilk Substitutes. Geneva: World Health Organization: Available at <https://www.who.int/publications-detail-redirect/9789240046085> (Accessed: 9 February 2024).

³⁵ Ibid

³⁶ Ibid

³⁷ Ibid

³⁸ Ibid

³⁹ World Health Organization (2023) Guidance on Regulatory Measures Aimed at Restricting Digital Marketing of Breast-Milk Substitutes. Geneva: World Health Organization. Available at: <https://www.who.int/publications-detail-redirect/9789240084490> (Accessed: 31 January 2024)

⁴⁰ World Health Organization (1981) International Code of Marketing of Breast-Milk Substitutes. Geneva: World Health Organization. Available at: <https://www.who.int/publications-detail-redirect/9241541601> (Accessed: 9 February 2024).

⁴¹ World Health Organization (1981) International Code of Marketing of Breast-Milk Substitutes: NetCode and Subsequent Resolutions. Geneva: World Health Organization. Available at: <https://www.who.int/teams/nutrition-and-food-safety/food-and-nutrition->

actions-in-health-systems/code-and-subsequent-resolutions (Accessed: 9 February 2024).

⁴² World Health Assembly 69 (2016) Ending Inappropriate Promotion of Foods for Infants and Young Children. Available at <https://iris.who.int/handle/10665/252789> (Accessed: 31 January 2024).

⁴³ World Health Organization (2022) WHA75(21) Maternal, Infant and Young Child Nutrition. Available at [https://apps.who.int/gb/ebwha/pdf_files/WHA75/A75\(21\)-en.pdf](https://apps.who.int/gb/ebwha/pdf_files/WHA75/A75(21)-en.pdf) (Accessed: 31 January 2024).

⁴⁴ World Health Organization (2022) Marketing of Breast-milk Substitutes Status Report 2022. Geneva: World Health Organization. Available at:

<https://www.unicef.org/media/120071/file/Marketing%20of%20Breast%E2%80%91milk%20Substitutes%20Status%20Report%202022.pdf> (Accessed 9 February 2024).

⁴⁵ World Health Organization (1981) International Code of Marketing of Breast-Milk Substitutes. Geneva: World Health Organization. Available at:

<https://www.who.int/publications-detail-redirect/9241541601> (Accessed: 9 February 2024).